

1 BEFORE THE ENVIRONMENTAL PROTECTION AGENCY

STATE OF ILLINOIS

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6 IN RE: SIGNIFICANT MODIFICATION OF THE CLEAN AIR ACT

PERMIT PROGRAM, AMEREN ENERGY GENERATING

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COMPANY'S COFFEEN ENERGY CENTER

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12 PUBLIC HEARING held, pursuant to Notice, on the
13 15th day of November, 2012, commencing at approximately
14 7:00 P.M., at the East Fork Township Building, 500 South
15 Prospect Street, Coffeen, Illinois, before Dean Studer,
16 duly appointed Hearing Officer.

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19 TRANSCRIPT OF PROCEEDINGS

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A P P E A R A N C E S

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Coordinator
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Illinois Environmental Protection Agency
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ILLINOIS EPA PANEL MEMBERS:

MICHAEL T. REED, Clean Air Act Permit Program,
Unit Manager, Permit Section, Bureau of Air

JOHN CASHMAN, Environmental Protection Engineer,
Air Monitoring Section, Bureau of Air

KAUSHAL DESAI, Environmental Protection Engineer,
Permit Section, Bureau of Air

Court Reporter:

Beth O. Zink, RPR
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1 HEARING OFFICER: Good evening. My name is
2 Dean Studer and I'm the hearing officer for the
3 Environmental Protection Agency. On behalf of Interim
4 Director, John Kim, I welcome you to tonight's hearing.
5 My purpose tonight is to ensure that these proceedings
6 run properly, according to rules, and are conducted in a
7 fair but efficient manner. Personally, I will not be
8 responding to specific technical issues related to the
9 permit, but will defer such issues to the technical staff
10 up here with me.

11 This is an informational hearing before the
12 Illinois EPA in the matter of Significant Modification of
13 a Clean Air Act Permitting Program, otherwise (CAAPP),
14 permit for Ameren Energy Generating Company's Coffeen
15 Energy Center located at 134 CIPS Lane near the Village
16 of Coffeen here in Montgomery County.

17 A Title V air permit was issued on September
18 29th, 2005. On November 3rd, 2005 Ameren petitioned the
19 Pollution Control Board for administrative review of the
20 permit. Ameren also requested that the permit be stayed.
21 On February 16th, 2006 the Board stayed the permit in its
22 entirety pending resolution of the appeal proceeding.

23 As part of the process to resolve the appeal
24 and provide for the effectiveness of the Initial CAAPP
25 permit, the Illinois EPA plans to issue separate

1 revisions to the CAAPP permit addressing the contested
2 conditions of the appeal. By this permitting action, and
3 consistent with extensive consultations with both the
4 United States EPA and Ameren, the Illinois EPA would
5 revise certain terms and conditions using the procedures
6 for a Significant Modification of a CAAPP permit.

7 As part of this proceeding, the Illinois EPA
8 has prepared documents for public review that outline the
9 modifications that are the subject of this hearing. The
10 Illinois EPA is holding this hearing for the purpose of
11 accepting comments from the public on the proposed
12 modifications of the air pollution control permit for
13 this project prior to taking final action on the
14 modification.

15 This public hearing is being held under the
16 provisions of the Illinois EPA's procedures for permit
17 and closure plan hearings, which can be found at 35
18 Illinois Administrative Code, Part 166, Subpart A.
19 Copies of these procedures can be accessed on the website
20 for the Illinois Pollution Control Board at
21 www.ipcb.state.il.us, or can be obtained from me, upon
22 request.

23 An informational public hearing is exactly
24 that. It is an opportunity for you to provide
25 information to the Illinois EPA concerning this permit.

1 This is not a contested case hearing. I would like to
2 explain how tonight's hearing is going to proceed.

3 First, I will have the Illinois EPA staff
4 introduce themselves and identify their responsibilities
5 within the agency in regards to this permitting action.
6 Then, Michael Reed from the Bureau of Air at Illinois EPA
7 and two of his staff will briefly explain the CAAPP
8 permit program and permit modifications. I will then
9 provide an opportunity for Ameren to make a brief
10 statement. This will be followed by additional
11 instructions on how I will take oral comments during the
12 hearing this evening, and then I will allow the public to
13 begin providing comments.

14 You are not required to provide your comments
15 orally. Written comments are given the same
16 consideration and may be submitted to the Illinois EPA at
17 any time during the comment period. The comment period
18 ends on December 17th, 2012. All comments submitted by
19 mail must be postmarked no later than December 17th,
20 2012. Although we will continue to accept comments
21 through that date, tonight is the only time that we will
22 accept oral comments.

23 The Illinois EPA would like to have a final
24 decision in this matter as quickly as possible and as
25 quickly as is practical; however, the actual decision

1 date will depend upon the number and nature of comments
2 received as well as other factors.

3 Any person who wants to make oral comments
4 may do so, as long as the statements are relevant to the
5 issues at hand and time allows. If you have not
6 completed a registration card at this point, please see
7 Brad Frost in the registration area and he will provide
8 you with a registration card. Please be sure to check
9 the appropriate box on the card if you desire to make
10 comments at the hearing this evening.

11 If you have lengthy comments, it may be
12 helpful to submit them in writing to me before the end of
13 the comment period, and I will ensure that they are
14 included in the hearing record as an exhibit.

15 Please keep your comments relevant to the
16 issue at hand. The foci of this hearing are the
17 conditions and requirements in the permit that Illinois
18 EPA is proposing to modify. If your comments fall
19 outside of the scope of this hearing, I may ask you to
20 proceed to other issues.

21 Ameren is also free to respond to issues that
22 are raised, if willing to do so, but I am not in a
23 position to require them to do so. I will not allow the
24 speakers to argue or engage in prolonged dialogue with
25 each other or with members of our hearing panel. I also

1 will not allow members of the public to address comments
2 to other members of the public. Comments from the public
3 are to be addressed to the hearing panel and the court
4 reporter.

5 In addition, I would like to stress that we
6 want to avoid unnecessary repetition. If anyone before
7 you has already presented what is contained in your
8 comments, please skip over those issues when you speak.
9 If someone speaking before you has already said what you
10 desired to say, you may pass when I call your name to
11 come forward. Again, we are accepting written comments,
12 which will become part of the official record in this
13 matter and will be considered.

14 All who legibly complete a registration card
15 or submit written comments in this matter during the
16 comment period will be notified of the final decision in
17 this matter and of the availability of the responsiveness
18 summary. In the responsiveness summary the Illinois EPA
19 will respond to all significant issues that were raised
20 at this hearing or submitted to me prior to the close of
21 the comment period. Again, the record in this matter
22 will close on December 17th, 2012, and I will accept
23 written comments as long as they are postmarked no later
24 than that date.

25 While the record is open, all relevant

1 comments and documents or data will be placed into the
2 hearing record as exhibits. Please send all written
3 documents to my attention. They should be mailed to Dean
4 Studer, that's D-e-a-n, Studer, S-t-u-d-e-r, Hearing
5 Officer, Office of Community Relations, Regarding Ameren
6 Coffeen Energy Center Air Permit, Illinois EPA, 1021
7 North Grand Avenue East, P.O. Box 19276, Springfield,
8 Illinois 62794-9276. This address is also given on the
9 public notice for the hearing tonight.

10 At this time please silence all cell phones
11 and pagers, if you have not already done so. I will now
12 have the Illinois EPA staff up here present with me this
13 evening introduce themselves, then Mike Reed and two of
14 his staff will make brief statements regarding the permit
15 and the permitting process, and this will be followed by
16 Kenneth Anderson, Managing Supervisor, Air Quality,
17 Environmental Services, of Ameren, making a few brief
18 remarks this evening. Mike.

19 MR. REED: Good evening, folks, and thank you
20 for coming out to this public hearing. Before I start,
21 my name is Michael Reed, M-i-c-h-a-e-l, R-e-e-d. I'm a
22 CAAPP unit supervisor and responsible for making sure
23 CAAPP permits are properly written and get out in a
24 timely fashion. I also would like to just say that I
25 have six of my brand new engineers with me tonight that

1 are here for training purposes. They all have never seen
2 a public hearing, so they're here to observe and watch so
3 that when they have to do one of these, they can do it
4 well.

5 So, the purpose of this hearing is to discuss
6 the development for the significant modification to the
7 Clean Air Act Permit Program permit for the Coffeen
8 Energy Center; that's a coal-fired power plant located
9 near Coffeen, Illinois. This planned action would make
10 certain revisions to the CAAPP permit for this source.
11 These revisions arise from the settlement of the permit
12 appeal currently pending before the Illinois Pollution
13 Control Board for the CAAPP permit that was initially
14 issued by the Illinois EPA.

15 The Illinois EPA is committed to achieving
16 permit effectiveness and a resolution of this and all
17 other CAAPP permit appeals for the remaining coal-fired
18 power plants in the most expeditious and legally
19 defensible manner possible. To say that the Illinois EPA
20 has not had its share of challenges in the development of
21 this and other CAAPP permits would be an exaggeration.

22 The historical development of these CAAPP
23 permits for these sources has been a long and arduous
24 one, a product of the regulatory complexities surrounding
25 one of the nation's predominant energy sectors and the

1 various environmental challenges that accompany their
2 operations.

3 The task of permitting these sources was
4 perhaps made more difficult by the competing differences
5 of the view by interested parties, the permittees and the
6 permitting authorities, on numerous permitting issues.

7 It is not surprising that the process of
8 issuing final initial CAAPP permits for these sources
9 back in 2005 resulted in litigation, first from
10 environmental advocacy groups who filed various petitions
11 with Region V challenging the legal adequacy of the
12 permitting approach, and second, from the permittees who
13 filed administrative appeals with the Illinois Pollution
14 Control Board shortly after permit issuance.

15 What should not go unnoticed is the fact that
16 after working closely and cooperatively with Region V,
17 the permits for all of these sources were, in fact,
18 issued without objection from USEPA. It should also be
19 kept in mind that the issuance of this permit would
20 reflect a settlement position that resolves the pending
21 permit appeal, not a unilateral permitting action or
22 decision by the Illinois EPA as is ordinarily the case.

23 As a result, the Illinois EPA's emphasis has
24 been on seeking a settlement resolution of the pending
25 CAAPP permit appeal, with the negotiated outcome being

1 memorialized in permit revisions implemented through
2 established CAAPP procedures.

3 As you probably realize, the essential nature
4 of settlement requires that two parties with a mutual
5 interest find a common ground. It should be appreciated
6 that compromise and settlement is a deliberative,
7 back-and-forth process that can and has taken many
8 months. Many of these administrative appeals and the
9 resulting negotiations for such issues inevitably demand
10 a fine-grain analysis entailing differences in permit
11 terms from one facility and source -- sources to another.
12 Negotiations must necessarily proceed condition by
13 condition, consuming an extensive amount of time and
14 resources.

15 To that end, this CAAPP permit is the first
16 coal-fired power plant appeal to be resolved utilizing
17 the approach developed by the Illinois EPA as outlined in
18 our Statement of Basis at Chapter 1, Section 1.3. The
19 revisions being undertaken in this permitting action have
20 been discussed in the Statement of Basis and are, for
21 purposes of this hearing, involve the changes pertaining
22 to the significant modifications to the permit as
23 outlined in the Statement of Basis at Chapter 3, Sections
24 3.1 and 3.2.

25 Among some of these changes are two

1 conditions pertaining to the submittal of Annual
2 Emissions Reports and the Reference Method used during an
3 emissions test for particulate matter. These two appeal
4 points challenged the Illinois EPA's authority to impose
5 such conditions in the permit when no underlying
6 requirement existed in any environmental statutory or
7 regulatory provision at the time of permit issuance.

8 The underlying regulatory requirements did
9 not provide support for these conditions, were beyond the
10 scope of agency authority, and therefore have been
11 removed from the permit. The requirement to report has
12 been retained for annual emissions, and it is noteworthy
13 to mention that by virtue of the Part 254 rules, the
14 source is required to report these pollutants consistent
15 with those pollutants now becoming regulated by
16 corresponding law.

17 I will now turn over the discussion to Mr.
18 John Cashman and Mr. Kaushal Desai to give a brief
19 summary of some of the other more prominent changes to
20 the permit, at which time the hearing officer will then
21 open the floor for comments from the audience.

22 MR. CASHMAN: Hello and good evening, ladies
23 and gentlemen, and thanks again for coming. My name is
24 John Cashman, J-o-h-n, C-a-s-h-m-a-n. I want to describe
25 a particular enhancement to the draft permit. It is

1 Compliance Assurance Monitoring, or the acronym CAM, and
2 that's spelled C-A-M.

3 CAM requirements in CAAPP permits are
4 specified in 40 CFR Part 64. In general, applicability
5 determination for CAM is required when the CAAPP permit
6 is renewed. An exception to this is for large units. A
7 large unit has potential post-control emissions that are
8 greater than major source threshold levels.
9 Applicability determinations for large units are required
10 if the initial CAAPP permit was submitted after April 20,
11 1999 -- or 1998, excuse me, or for large units that are
12 part of a significant permit modification after April 20,
13 1998.

14 This draft permit incorporates these CAM
15 requirements for the coal-fired boilers and can be
16 located in Condition 7.1.13. Applicability
17 determinations for CAM for the other units were evaluated
18 as well. It was determined that the CAM requirements
19 were not necessary at this time for those units in
20 Sections 7.2 through 7.6 as identified in Subsection 4 of
21 those sections.

22 MR. DESAI: Hello. My name is Kaushal Desai,
23 K-a-u-s-h-a-l, D-e-s-a-i, and I'm a Title V engineer at
24 the Illinois EPA. I will talk about a couple of
25 additional points in the permit.

1 Another area where changes were made is the
2 records kept for startup. The Illinois EPA has added to
3 the amount of records in this regard. Ameren must
4 continue to keep basic information; date, time, duration,
5 but now they will keep additional records. These include
6 descriptions and written documentation that established
7 procedures were followed. If established procedures were
8 not followed, documentation on the reasons why must be
9 kept.

10 If there is a startup where there might have
11 been an exceedance, that will also trigger additional
12 record keeping requirements. Ameren would notify the
13 Illinois EPA of which standards might have been exceeded,
14 explanation of the nature and magnitude of excess
15 emissions; also, what steps Ameren took to minimize
16 excess emissions and how to prevent such occurrences in
17 the future.

18 Also, the Illinois EPA has revised some of
19 the requirements for the various coal handling, coal
20 processing and fly ash operations at the source.
21 Inspection protocols for these operations at the facility
22 have been revised, as well as the requirements of Method
23 22 and Method 9 testing. In addition, a number of
24 measures are being taken to ensure compliance with
25 applicable opacity and PM standards such as use of water

1 spray and enclosures and covers. These are being
2 distinguished as established control measures rather than
3 control devices.

4 HEARING OFFICER: Thank you. At this time I
5 believe that Mr. Anderson would like to make some opening
6 remarks.

7 MR. ANDERSON: Good evening. I am Ken
8 Anderson, Managing Supervisor, Air Quality Management
9 from Ameren Environmental Services. I sincerely
10 appreciate the opportunity to address the public and the
11 Agency during tonight's hearing on behalf of the Coffeen
12 Energy Center. In addition, I would like to thank the
13 staff of IEPA's CAAPP unit for working with Ameren to
14 develop a workable operating permit that fully addresses
15 compliance with applicable regulatory requirements.

16 The Coffeen Energy Center is one of Ameren
17 Energy Generating Company's major electrical generation
18 facilities. Ameren Energy Generating Company has
19 invested almost \$900 million for environmental
20 improvement projects over the past decade at the Coffeen
21 Energy Center. These environmental projects have
22 included the installation of a new sulfur dioxide
23 scrubber on each of the two coal-fired units, a
24 precipitator upgrade on Unit 1 and a new precipitator on
25 Unit 2, plus overfire air systems and selective catalytic

1 reduction systems on both units.

2 These new scrubbers are designed to reduce
3 sulfur dioxide emissions by more than 90 percent. In
4 addition to SO₂ control, the scrubbers also help to
5 reduce mercury emissions. The electrostatic
6 precipitators offer an efficient way to capture
7 particulate matter and prevent the release to the
8 atmosphere. The overfire air systems help to prevent the
9 creating of nitrogen oxides while coal is being burned.
10 The selective catalytic reduction systems further reduce
11 NO_x emissions by breaking down remaining NO_x present in
12 the exhaust gases into elemental benign nitrogen and
13 water.

14 Installation of these technologies follows a
15 host of other improvements to equipment and systems to
16 increase operational efficiency and support cleaner water
17 and air emissions at the energy center. Since 2005 NO_x
18 emissions have been reduced by 85 percent, and SO₂
19 emissions have been reduced by 99 percent. Mercury
20 emissions have been reduced by nearly 90 percent, and
21 particulate matter emissions have been reduced by over 95
22 percent. The Coffeen Energy Center is among the cleanest
23 coal-fired generating facilities in the nation in terms
24 of emissions.

25 Construction of the air pollution control

1 equipment illustrates Ameren's commitment to the
2 environment. The Coffeen Energy Center has been part of
3 the Illinois community since the 1960s. The energy
4 center includes an 1,100 acre, man-made cooling lake and
5 surrounding area, which is managed by the Illinois
6 Department of Natural Resources as the Coffeen Lake State
7 Fish and Wildlife Area. Coffeen Lake provides outdoor
8 recreational activities for boaters, anglers, and hunters
9 and is well known as a successful fishing and hunting
10 area. The surrounding land is utilized by the public for
11 outdoor activities including bird watching, mushroom
12 hunting and picnicking.

13 The Coffeen Energy Center provides
14 good-paying jobs for the local community. There are
15 nearly 200 full-time employees with additional
16 contractors that invest their earnings in the nearby
17 area. The Coffeen Energy Center also provides millions
18 of dollars to the local community through payment of
19 property and other taxes.

20 In closing, the revised permit is necessary
21 for continued responsible and efficient operation of the
22 Coffeen Energy Center. Thank you.

23 HEARING OFFICER: Thank you, Mr. Anderson.
24 While the issues raised tonight may indeed be heartfelt
25 concerns to many of us in attendance, applause is not

1 appropriate during the course of this hearing. On a
2 similar note, booing, hissing and jeering are also not
3 appropriate and will not be allowed tonight.

4 Secondly, I'm going to ask that a statement
5 be made tonight -- I'm not going to allow statements that
6 do not relate to the issues involved with the air
7 permits. Statements and comments that are of a personal
8 nature or reflect on the character or motive of a person
9 or group are not appropriate in this hearing. If
10 statements or comments drift into this area, I may
11 interrupt the person speaking and ask you to continue to
12 your next relevant issue.

13 As hearing officer, I intend to treat
14 everyone here tonight in a courteous, respectful and
15 professional manner. I ask that members of the panel and
16 the public do the same. If the conduct of persons
17 attending this hearing should become unruly, I am
18 authorized to adjourn this hearing, should the actions
19 warrant. In such a case, the Illinois EPA would still
20 accept written comments through the close of the comment
21 period.

22 We are here tonight to listen to
23 environmental issues. You may disagree with or object to
24 some of the statements and comments made tonight, but
25 this is a public hearing and everyone has a right to

1 express their comments on this matter.

2 Again, written comments are given the same
3 consideration as oral comments received during the
4 hearing and may be submitted to the Illinois EPA at any
5 time within the public comment period which runs through
6 December 17th, 2012. Although we will continue to accept
7 comments through that date, again, tonight is the only
8 opportunity that we will be affording for oral comments.

9 Any person who wishes to make oral comments
10 may do so, as long as the statements are relevant to the
11 issues at hand and time allows. If you have lengthy
12 comments, please consider giving a summary of those
13 comments during this hearing and then submitting comments
14 in their entirety to me in writing before the close of
15 the comment period. I will ensure that they are included
16 in the hearing record as an exhibit.

17 If everyone has an opportunity to speak,
18 normally what I would do in a hearing like this is I
19 would impose a time limit. However, we have only got a
20 couple of people that have registered to speak this
21 evening, so what I will do is I will allow us to go for
22 10 to 15 minutes and then we'll go to the other person
23 and we'll go back and forth. After both of you have
24 spoken once, I will ask if there is anyone else here that
25 hasn't spoken that wants to do so and we'll go through

1 this. I would like to conclude this hearing in about 90
2 minutes or less, if possible, just so that we stay on
3 schedule.

4 If we cannot accommodate everyone, I do want
5 to remind you, again, that you do have the opportunity to
6 submit comments to us in writing and we will be
7 responding to those in the responsiveness summary.

8 I also would like to avoid unnecessary
9 repetition. Again, our decision is not based on how many
10 times a comment is made. It is based primarily on the
11 applicable laws, regulations and requirements as to our
12 permitting decision.

13 We have a court reporter here who is taking a
14 record of these proceedings for the purpose of us
15 compiling our administrative record. Therefore, for her
16 benefit, please keep the general background noise in the
17 room to a minimum so that she can hear everything that is
18 said. Illinois EPA will post the transcript of this
19 hearing on our webpage in the same general place where
20 the hearing notice, project summary and the draft permit
21 were posted. It is my desire to have this posted in
22 about two to two and a half weeks following the close of
23 this hearing, but the actual date will depend on when the
24 transcript is received by the Illinois EPA.

25 When it is your turn to speak, I will call

1 your name to come forward. For the record, you should
2 state your name and, if applicable, any governmental
3 body, organization or association that you represent. If
4 you are not representing a governmental body,
5 organization or an association, you may simply indicate
6 that you are a concerned citizen or a member of the
7 public.

8 For the benefit of the court reporter, I ask
9 that you spell your last name. If there are alternate
10 spellings for your first name, you may also spell your
11 first name. Once you spell your name, I will give you
12 about 10 to 15 minutes this evening to complete your
13 comments. We will alternate and we'll go through again.
14 I would like to be able to complete this hearing by
15 around 8:00 to 8:30, in that neighborhood.

16 I ask that while you are speaking, that you
17 direct your attention to the hearing panel and to the
18 court reporter to ensure that an accurate record of your
19 comments can be made. Again, prolonged dialogue with
20 members of the hearing panel or with others here in
21 attendance is not permitted. Comments directed to the
22 audience are also not allowed.

23 I remind everyone that the focus of this
24 hearing is the proposed modification of the Title V
25 permit, specifically, the conditions and the requirements

1 that Illinois EPA has proposed for modification as
2 outlined in the documents available at the registration
3 table and on the Illinois EPA website. People who have
4 requested to speak will be called forward in the order
5 that they have registered.

6 When I call your name, I would ask that you
7 come forward. I will allow you to sit on the chair here
8 on my left. That way you're close enough and I think the
9 court reporter then should be able to accurately
10 transcribe what you're saying. More than anything, we
11 want a clear and concise record of tonight's hearing.

12 If there are members of the audience that
13 cannot hear, please raise your hand as questions are
14 being asked. I realize with their back toward you that
15 it may be a little difficult to hear, so we're not using
16 a PA system. We have a relatively small group here, so
17 I'm going to ask that when you do speak, that you please
18 speak up so that others in the room can hear the issues
19 or questions that you have this evening.

20 Are there any questions on how I will be
21 conducting the hearing? Okay. With that, the first
22 person is Andrew Armstrong.

23 MR. ARMSTRONG: Thank you, Mr. Studer.
24 Andrew Armstrong with the Environmental Law and Policy
25 Center. First, I want to thank the Illinois EPA for

1 holding this informational hearing today. This is very
2 helpful for my organization and other members of the
3 public to help get the information we need to adequately
4 evaluate this Title V permit and the other Title V
5 permits for coal-fired power plants that will be coming.

6 We do appreciate the efforts that Illinois
7 EPA is making to issue legally sufficient Title V permits
8 for this plant and other Illinois coal plants. It's
9 unfortunate that it's taken us so long, but we are here
10 now, so it's good to be making progress.

11 That said, my organization and other members
12 of the public have watched this process keenly and will
13 continue to do so. We want to make sure that the permits
14 that are issued by Illinois EPA contain all applicable
15 legal requirements of the Clean Air Act and Illinois
16 stated implementation plan, and more importantly, the
17 monitoring, record keeping and operational provisions
18 that are necessary to assure compliance with these
19 requirements.

20 So to that end, I have prepared some
21 questions for Illinois EPA which I did pass along to the
22 agency earlier. I'm hoping to ask those questions today
23 along with other follow-up questions as necessary to help
24 in our information gathering process. These questions
25 are related to the Compliance Assurance Monitoring plan

1 in the draft permit.

2 Question Number 1, the CAM plan conditionally
3 approved in Condition 7.1.13-1 of the draft permit
4 includes parametric monitoring of scrubber recycle pumps.
5 Subquestion A, why were the scrubber recycle pumps
6 selected for parametric monitoring? Why not the plant's
7 electrostatic precipitators?

8 MR. CASHMAN: There were two monitoring --
9 monitors being proposed in the CAM plan. One was opacity
10 as well as the recycle pumps. The plant's electrostatic
11 precipitators would be -- have an indicator on there
12 based on their opacity and their COMS and then the
13 scrubbing rate would be for the ESP -- or for the --

14 MR. REED: The recycle pumps.

15 MR. CASHMAN: Yes.

16 MR. REED: I'll just step in a little bit
17 here. The ESP, electrostatic precipitator, it was
18 selected as a monitor, a parameter to be monitored, and
19 that parameter is opacity, and that's being monitored at
20 the outlet of the electrostatic precipitator prior to the
21 inlet scrubber, okay? And the reason being is the
22 primary collection device for particulate matter is the
23 electrostatic precipitator. So, yes, you are correct,
24 the electrostatic precipitator is the key control device
25 for this pollutant. And the recycle pumps, that is only

1 a secondary parameter that was chosen, and that's because
2 that is the final air pollution control device in the
3 stream prior to the particulate matter being discharged
4 into the atmosphere.

5 So that is predominantly what has happened
6 here. We did choose -- it's really a combination of
7 different parameters being used for different control
8 devices, since this is a multiple control device
9 controlled stream.

10 MR. ARMSTRONG: Could I ask one follow-up
11 question to that?

12 MR. REED: Sure.

13 MR. ARMSTRONG: Is the agency aware of all
14 the permits for coal-fired power plants that have had --
15 CAM plans that have used parametric monitoring of the
16 scrubber as part of the CAM plan?

17 MR. REED: I am not here tonight familiar
18 with any, but I can certainly go back and research that
19 and see.

20 MR. ARMSTRONG: Just a real quick follow-up.
21 Are you familiar with any USEPA guidance on CAM plans
22 that discuss or approve of use of the scrubber --
23 parametric monitoring of the scrubber in a CAM plan for a
24 coal-fired power plant?

25 MR. REED: Yeah, we do. We use USEPA's

1 technical guidance documents for compliance assurance
2 monitoring as a guidance, yes.

3 MR. ARMSTRONG: And that's EPA's CAM
4 technical guidance document?

5 MR. REED: Correct.

6 MR. ARMSTRONG: So specifically this is my
7 question, 1-B in the questions that I earlier submitted:
8 Specifically how do the scrubber recycle pumps
9 demonstrate compliance with the PM emission limits?

10 MR. CASHMAN: Again, that would be in
11 relationship to with the opacity that would be helping us
12 determine, first, if the ESP was performing correctly,
13 and then with the recycle pumps, that gives us an
14 indication for the scrubber, and I believe in a technical
15 guidance document that the scrubbing liquid distribution
16 system pressure or pump monitoring current can be
17 monitored as a surrogate for the liquid flow rate being
18 used in the scrubber.

19 MR. REED: The recycle pumps, they're
20 basically being used as a surrogate for liquid flow rate
21 and that is addressed in the document that you have
22 mentioned. And yes, the document does say that it is a
23 less reliable parameter; however, given the combination
24 of monitoring of opacity at the outlet of the
25 electrostatic precipitator coupled with this secondary

1 parameter for recycle pumps, we considered that to be a
2 reliable method of keeping track of what the particulate
3 matter is for purposes of compliance assurance
4 monitoring.

5 MR. ARMSTRONG: So just so I'm sure which
6 document we're talking about, we're talking about -- are
7 we talking about Section B-4 of the CAM technical
8 guidance document?

9 MR. REED: Correct. I have it here, Andrew,
10 if you would like.

11 MR. ARMSTRONG: Sure.

12 MR. REED: Just that section, not the entire
13 document.

14 MR. ARMSTRONG: Yeah.

15 MR. REED: That's several hundred pages long.

16 MR. ARMSTRONG: Right, right. May I
17 approach?

18 HEARING OFFICER: Sure.

19 MR. REED: And I believe what they are
20 monitoring is the motor pump amperage, the motor amperage
21 on those pumps. We can double check that.

22 MR. ARMSTRONG: So would you say that
23 monitoring the number of scrubber recycle pumps in
24 service is equivalent to monitoring for scrubber recycle
25 pump current?

1 MR. REED: I believe they're going to measure
2 the current, yes. That will determine how many pumps are
3 in service. Like I said, Andrew, we'll double check that
4 and make sure that that is correct.

5 MR. ARMSTRONG: Question Number 2: On page
6 15 of the statement of basis, Illinois EPA states, with
7 respect to the CAM plan, quote, "Testing will determine
8 the upper limit of opacity as measured in the flue gas
9 stream, which assures compliance with the PM limit."

10 Does Illinois EPA believe this is technically
11 achievable?

12 MR. CASHMAN: Yeah, we do. We wouldn't have
13 given this preliminary approval on the CAM plan waiting
14 for a test requirement if we didn't think it was
15 technically achievable. I believe we've seen preliminary
16 numbers of what opacity to PM emissions are, but until
17 they're finalized and gone through the tests to verify
18 this with these parameters, then that is when we would be
19 able to determine precisely if it is achievable exactly.
20 But we wouldn't be in this position today if we didn't
21 think it was.

22 MR. REED: Yeah, we -- in the statement of
23 basis there is a section where we talk about the appeal
24 point regarding the relationship between particulate
25 matter and opacity, which was one of the points that

1 Ameren had contention with as far as their appeal goes.
2 And in there we actually do provide some of the very
3 limited data that we had available to look at to make
4 sure that we were comfortable that they could go forward
5 with this testing and come up with a reliable indicator.

6 MR. ARMSTRONG: One follow-up question on
7 that, and one of the appeal points was Condition
8 7.1.9(c)(ii) which had set forth record keeping
9 requirements for the COMS, and one of the conditions in
10 the original permit was that Ameren was to develop
11 opacity value that would be set at, quote, "The upper
12 bound of the 95 percent confidence interval."

13 And as Illinois EPA describes in the
14 Statement of Basis on Page 15, "This process thus would
15 develop a specified, albeit evolving, value for opacity
16 that would serve as an indicator of a potential problem
17 with compliance assurance for PM."

18 However, Ameren appealed this condition, and
19 a bit later on on page 15 Illinois EPA states, quote,
20 "Subsequent settlement discussions confirmed the
21 difficulties in the condition as stated. Among other
22 things, it required a correlation between opacity and PM
23 emissions meet a statistical criterion as related to the
24 confidence interval that would not necessarily be able to
25 be met given the nature of the correlation and the data

1 that would be available to develop the correlation."

2 Do you see the difficulties that you
3 identified with respect to Condition 7.1.9(c)(ii) also
4 creating difficulties in setting upper bound with opacity
5 with respect to the CAM plan?

6 MR. REED: Actually I don't, because that
7 condition was patterned off of the performance
8 specification for PM CEMS, which is an extremely tight
9 performance specification that's required to be met which
10 has those statistical-type criteria in it in order for it
11 to be certified. We don't believe that compliance
12 assurance monitoring is of that level of stringency and
13 that it should just assure reasonable compliance, and so
14 therefore, we believe that what Ameren has provided is
15 reliable and can be achieved.

16 MR. ARMSTRONG: So the second part of my
17 Question 2, once Ameren would determine the upper limit
18 of opacity which assures compliance with the PM limit,
19 what margin of compliance does Illinois EPA view as
20 appropriate in then setting opacity indicators for the
21 CAM plan?

22 MR. REED: Well, that actually is a good
23 question that I gave some considerable thought to, and I
24 have yet to have a reasonable answer for you right now,
25 Andrew, on that question. Chris Romaine just stepped in.

1 Most of you know Chris. Chris might have some thoughts
2 on that question. I don't know.

3 MR. ROMAINE: I haven't thought about it
4 concretely either. My only question would be whether
5 under a CAM plan do you actually need a compliance
6 margin. So that's the fundamental issue of your question
7 posed to me. By the way, Chris Romaine, R-o-m-a-i-n-e.

8 MR. REED: So we're still thinking about that
9 one, Andrew. That is a very good question and I think it
10 deserves a little more thought on our side to give you a
11 good answer.

12 MR. ARMSTRONG: Question Number 3, At
13 Condition 7.1.13-2(c)(ii)(a) on page 77 of the draft
14 permit, the permits sets out the response to excursions
15 of opacity, and I'll just quote from the first couple
16 sentences. "The permittee shall restore operation of the
17 PSEU, including the control device and associated capture
18 system, to its normal or usual manner of operation as
19 expeditiously as practicable in accordance with good air
20 pollution control practices for minimizing emissions.

21 The response shall include minimizing the
22 period of any startup, shutdown or malfunction and taking
23 any necessary corrective actions to restore normal
24 operation and prevent the likely recurrence of the cause
25 of an excursion other than those caused by excused

1 startup or shutdown conditions."

2 In the case of PM emissions from the Coffeen
3 plant, what does "good air pollution control practices
4 for minimizing emissions" mean?

5 MR. CASHMAN: I believe that one is just in
6 Condition B. B talks about pursuant to 64.7(d)(ii) of 40
7 CFR, determination of whether the permittee has used
8 acceptable procedures in response to an excursion will be
9 based on the information available, which may include,
10 but is not limited to monitoring results, reviewing
11 operating and maintenance procedures and records and
12 inspection of control devices.

13 MR. ARMSTRONG: Follow-up question to that.
14 So this condition pretty much just quotes verbatim 40 CFR
15 64.7(d)(ii)?

16 MR. CASHMAN: Correct.

17 MR. ARMSTRONG: So Subsection B states what
18 information can be used to determine whether acceptable
19 procedures have been used in response to an excursion,
20 but it doesn't, to my mind, provide information as to
21 what good air pollution control practices for minimizing
22 emissions are.

23 MR. REED: Well, that's what I was -- before
24 I allowed John to answer, I was going to say those are
25 the good air pollution control practices, your inspection

1 requirements, to inspect the equipment, and to look at it
2 and make sure that it's operating properly, all your
3 maintenance procedures, following those and keeping the
4 equipment in good condition and operating properly,
5 maintaining records to monitor trends, looking at your
6 monitoring data to insure that it's staying within the
7 bounds of the design parameters and all those things.
8 Those are your basic umbrella-type good air pollution
9 control practices for minimizing emissions.

10 MR. ROMAINE: I would like to emphasize that
11 the concept of operating within normal operating ranges,
12 that's what I see is the key element of good air
13 pollution control practices.

14 MR. ARMSTRONG: So follow-up question on
15 Subsection B with respect to operation and maintenance
16 procedures and records. Are the operation and
17 maintenance procedures incorporated into this permit?

18 MR. REED: We have not incorporated those
19 operating procedures into this permit by reference. We
20 don't believe there is anything enforceable, that we're
21 aware of, in those that need to be incorporated.

22 Andrew, I would like to step back to one of
23 your original questions.

24 MR. ARMSTRONG: Sure.

25 MR. REED: I looked at the CAM plan, and they

1 are actually going to monitor motor amperage.

2 MR. ARMSTRONG: Okay.

3 MR. REED: Yes.

4 MR. ARMSTRONG: That was all I had for the
5 questions I pre-submitted. I do have one other brief
6 question.

7 MR. REED: Sure.

8 MR. ARMSTRONG: With respect to
9 7.1.9(g)(ii)(c), and this is on pages 57 and 58. This is
10 record keeping requirements for startup, and in the
11 original permit there was a record keeping requirement
12 for startups longer than six hours that has now been
13 changed to startups exceeding 24 hours, and in the
14 Statement of Basis Illinois EPA states the following,
15 quote, "As a result of discussions with Ameren, it was
16 concluded that its assumptions about typical startup
17 durations at the source were imperfect. Startups up to
18 24 hours in duration should be considered typical for the
19 coal-fired boilers at this source given the design of
20 these boilers."

21 There is also the statement, "This is based
22 on information provided by Ameren that shows typical
23 startup lasts longer than 22 hours." What was the
24 information provided by Ameren?

25 MR. REED: Kaushal, would you like to address

1 that?

2 MR. DESAI: When we were discussing this
3 condition with Ameren and they -- after it was appealed,
4 Ameren submitted to us startup hours for the boilers
5 showing almost a step-by-step process from initial
6 startup to, you know, all the different things that they
7 do, and that came out to be the, I think, 22 hours that
8 we got. When we were doing the resolution of this point,
9 we made a specific request for them to show us that,
10 that, you know, we had six initially and they asked,
11 well, that's not typical, so we asked for something that
12 would be typical, and when they came with that, we asked
13 them to look in their records in the previous years when
14 they've started up, when they fired, and how long it
15 took, and based on that information, we used that to come
16 up with the times.

17 MR. ARMSTRONG: Do you believe this
18 information is specific to Coffeen as an individual
19 facility?

20 MR. DESAI: Yes. We asked specific for
21 Coffeen and for each boiler.

22 MR. ARMSTRONG: Then do you have an
23 understanding as to why the typical startup at Coffeen
24 might be over 20 hours when Illinois EPA's earlier
25 assumption was that startups are at six hours?

1 MR. DESAI: It was kind of based on an
2 imperfect --

3 MR. REED: If you want, I can address it.

4 MR. DESAI: Okay.

5 MR. REED: The reason it was an imperfect
6 assumption on the Agency's part at the initial issuance
7 was we had 22 power plants in the state. Each power
8 plant had its own application. We had startup numbers
9 that were across the map for the same size boilers, for
10 the same type of boilers. There wasn't a very good
11 description of the startup and what they went through and
12 how they derived those numbers, and so the Agency decided
13 to take an overall look at those and put them into blocks
14 based upon just the size of the boiler itself.

15 Well, when you do that, it turns out that
16 there are more intricacies involved in determining what a
17 startup includes and how long it takes for each
18 individual boiler, and that is how we have gotten to the
19 point where we are now, is we are actually looking at
20 those intricacies and developing a site-specific number.

21 MR. ARMSTRONG: So going forward with other
22 permits, do you anticipate that you would be developing
23 site-specific numbers for each?

24 MR. REED: Absolutely. Each site will have
25 its own numbers.

1 MR. ARMSTRONG: Okay. Well, that is all the
2 questions I had for you at this time. I appreciate all
3 your answers, and it's very helpful to provide
4 information so that my group and the rest of the public
5 can continue to evaluate this permit.

6 MR. CASHMAN: Can we ask you questions? How
7 is how we provided the permit to you and for the public
8 with the track changes and et cetera?

9 MR. ARMSTRONG: Track changes?

10 MR. CASHMAN: Was that helpful?

11 MR. ARMSTRONG: Personally I think it was
12 very helpful. I appreciate that the Agency posted all
13 this stuff on-line and provided such a relatively lengthy
14 period of review for the permit, and particularly
15 appreciative that you have provided this informational
16 hearing as well. So thank you very much.

17 MR. CASHMAN: Thank you.

18 MR. REED: Thank you.

19 HEARING OFFICER: Joyce Blumenshine will be
20 next.

21 MS. BLUMENSHINE: Thank you very much,
22 Hearing Officer Studer. My name is Joyce, J-o-y-c-e,
23 Blumenshine. I'm a volunteer and Conservation Committee
24 Chair for the Illinois Chapter Sierra Club. Illinois
25 Sierra club has approximately 26,000 members in our state

1 who value clean air and clean water, and we do sincerely
2 appreciate the IEPA holding this hearing tonight. Thank
3 you, Mr. Frost and Mr. Romaine, for being here also,
4 because the whole public process is very important to our
5 group and the goals that we have to protect the
6 environment for our families and our future.

7 As conservation chair for Illinois, I travel
8 across the state to our different Sierra groups. The
9 group that actually has this county is headquartered kind
10 of over in Alton, and I know one of my good friends and
11 Sierra member is Lee Shrout, who lives in Hillsboro, is
12 not feeling well tonight because he has chronic
13 obstructive pulmonary disease, and it's for our members
14 who face health challenges and have had problems with
15 asthma or other health issues that we do thank the IEPA
16 for finally getting to these CAAPP permits.

17 What you are doing is essential and very
18 important work for this state and for the health of the
19 people of this state and the taxpayers. I thank Ameren
20 for having the Coffeen Lake for the public, and I think
21 it should be noted that in addition to having that lake,
22 it has a warning for mercury for the fish there. At one
23 time when Arliss and I were there, the signs weren't up,
24 but I hope they are now.

25 The coal-fired power plants that have

1 provided us energy also provide us with a legacy of
2 health and environmental issues, and it is high time that
3 those issues be addressed. The Sierra Club is very
4 concerned that the permitting that's already been done
5 and the high standards for mercury pollutants and other
6 pollutants be sure to be incorporated, and I think the
7 term is the other hazardous air pollutants, that those be
8 included as this permit process moves forward.

9 The cost of pollution from coal-fired power
10 plants has been born by the public, by our state agencies
11 that help the public, and it's time for the so-called
12 living field, the playing field to be leveled on that.
13 Here in the Hillsboro area in Montgomery County we're out
14 in the beautiful rural heartland in kind of a far-off
15 place, it's the week before Thanksgiving, and I know
16 there are other concerned people, but this is a hugely
17 significant step, historic step, that Illinois EPA is
18 taking tonight.

19 We want to encourage you in your diligent
20 work and your expeditious requirements that you are going
21 to set up for these power plants and we're looking
22 forward to following through with the process as it
23 proceeds at the Illinois Sierra Club. Thank you again
24 for all your efforts and we'll be looking forward to the
25 other permits as they come forward.

1 I did have just a couple brief questions,
2 please. I did want to ask, what is the closest IEPA air
3 monitoring station to this area?

4 MR. CASHMAN: That would definitely be me to
5 answer that. I don't have that information with me, but
6 I can get that for you.

7 MS. BLUMENSHINE: That's just fine. I do
8 thank you, because that had come up before.

9 MR. CASHMAN: May I ask which type of monitor
10 are you looking for?

11 MS. BLUMENSHINE: Particularly we are
12 concerned about particulates in particular, but also what
13 -- I know sulfur will be reduced, but what --

14 MR. CASHMAN: We can provide the closest.

15 MS. BLUMENSHINE: That concerned us, because
16 I know Hillsboro, it's a little bit high ground. I mean
17 I don't know the dynamics of all the air flow, but
18 predominant winds from the south, southwest, and so for
19 certain communities in this area it can make a
20 difference, and also because the added pollution levels
21 now with a huge new coal mine here. A couple years ago
22 there was a coal fire in the coal piles and we tried to
23 find the air monitoring station and had trouble getting
24 data, so that raises my other questions.

25 Will the monitoring data reports be available

1 to the public in some means or do we need to FOIA that
2 information?

3 MR. CASHMAN: I'm actually in that section
4 now. I'm now in the air monitoring section, and I
5 believe those are available for you. I'll double check
6 with all that. I haven't yet learned that part of it
7 yet, but yes, we do have an intense -- we get --

8 MS. BLUMENSHINE: That's great.

9 MR. CASHMAN: -- all the data of each
10 monitoring type of what we have. I think we have six
11 different types of monitoring.

12 MR. REED: And actually it's ironic you ask
13 that question. I normally come to public hearings with
14 our annual reports from a few previous years just in case
15 that comes up. I've been so busy, I didn't grab that
16 tonight.

17 MS. BLUMENSHINE: We as the public need to be
18 aware, too, so that we can go to that directly and not be
19 bothering Agency staff.

20 MR. CASHMAN: I know on our website that we
21 do have an air monitoring section that does have those
22 there, those monitor reports there, and it does give
23 information. I'm not familiar with what exactly is
24 there.

25 MS. BLUMENSHINE: I know people use the kind

1 of alert levels for those, like with Lee with his health
2 problems, so with this additional step we just wanted to
3 be aware of that. I think that ends my comments. Again,
4 we thank the Illinois EPA for holding these hearings and
5 for your efforts. As it moves forward, we'll be watching
6 very closely. Thank you.

7 HEARING OFFICER: Thank you. Is there anyone
8 that has not spoken this evening that has comments or
9 questions they would like to present at this hearing?

10 MS. BATES: May I speak? My name is Mary
11 Bates and I live at 936 Vandalia Street in Hillsboro.
12 And I was coming in tonight and I noticed -- I missed the
13 road turning at the bank, but I went on through down and
14 I noticed there was a haze just over the streetlights, a
15 white haze. I thought it was fog at first, and I drove
16 under it and I realized that it was something else, it
17 wasn't fog. And I had my camera with me and I couldn't
18 get a picture of it, my camera is not working, but what
19 is that haze and what is the smell outside the door?
20 What is that?

21 MR. REED: Well, that's a good question. I
22 actually observed that as well this evening, not the
23 haze, we didn't get that far into town, but from what I
24 could tell, someone is burning leaves is what it actually
25 smelled like to me.

1 MS. BATES: Leaves?

2 MR. REED: Yeah, yard waste. I don't know if
3 there's a leaf ban, burning local rule here or not, but
4 that is generally the type of odor you would get from
5 burning leaves.

6 MS. BATES: Well, that's really the only
7 question I have. I live in Hillsboro and I have asthma
8 and we're really concerned about the mine over there.
9 The closest monitoring station is in Nilwood. I
10 remember a little town where it is, and a friend of mine
11 drove over there to look at it, but it's just a little
12 tiny mobile structure that has little antennas over it,
13 and when I called to find out what they monitor for, it
14 was for the overall state monitoring, what comes in from
15 other states. It wasn't for what I thought it was.

16 We were concerned about no monitoring station
17 in around the Deer Run mine, but now you're telling me
18 there are monitoring stations over here in this area
19 around this site, and my question is -- I think I asked
20 John earlier, would those monitoring stations pick up
21 pollutants that are coming when the wind is blowing,
22 would that blow over here, would they pick that up?

23 MR. CASHMAN: You're picking up those.
24 You're picking up background pollution that's coming in
25 from further away.

1 MR. ROMAIN: I think there's a
2 misunderstanding. When you asked the question about the
3 nearest monitors, we do not have monitors in this
4 immediate area. We place ambient monitors generally in
5 urban areas where we have high levels of pollutants to
6 measure concentrations where, in fact, we are approaching
7 the standards.

8 The monitors that we had in Nilwood, as was
9 generally described here, is what I would call background
10 monitor, so it was trying to get a base level of air
11 quality in the absence of any nearby sources. So it was
12 intentionally sited in an area of low population to see
13 what is, you know, what we have in rural areas.
14 Unfortunately, given the current budgetary constraints,
15 we do not have as many monitoring stations as we would
16 like to have.

17 MS. BATES: So given the three pollutants
18 that are listed in the permit there was arsenic, mercury
19 and chromium, would your monitoring stations pick up
20 those toxins?

21 MR. ROMAIN: We conduct monitoring for
22 metals in urban areas to verify the levels of metal
23 concentration in areas where we have a higher
24 concentration of sources, so the data from those monitors
25 would give you information that would be overly high

1 compared to this area.

2 MS. BATES: So are there monitors in this
3 area?

4 MR. ROMAINE: No. The nearest monitor, I
5 would suspect, would be --

6 MS. BATES: This is too small an area?

7 MR. ROMAINE: Yes. East St. Louis, Decatur,
8 Springfield. I don't know if we still monitor in
9 Nilwood.

10 MR. REED: I don't think we do, Chris, but
11 we'll have to look. And I would just add that the way we
12 get the metals is through our particulate monitors.
13 Generally we will sample particulate matter and that
14 filter will get sent off to a laboratory and the
15 laboratory will analyze the metal contents for the
16 various toxic metals that could be in the particulates.

17 MR. ROMAINE: Continuing with further
18 explanation, in terms of addressing metals emissions from
19 a source like Coffeen, you can address those through
20 testing of the emissions coming out of the stack. Where
21 that isn't possible, again, in urban areas or areas where
22 a number of different sources and you're trying to
23 combine impacts of many sources, vehicles, other types of
24 activity, contributions from background air.

25 MS. BATES: My next question is Hillsboro is

1 what, between 4,000 to 5,000 population. Coffeen is real
2 small. But we have several sources. We have the Taylor
3 Springs smelting plant, which is Superfund, and we have
4 the Eagle-Picher smelter, that's also a Superfund in
5 clean-up. Now we have the mine, the Deer Run mine that's
6 up and going. There are issues there. There's been an
7 event already last year that we experienced, and there's
8 the Ameren plant. That's a lot -- there's four sources
9 that I've identified on my own, and I just live here, but
10 since the population is so small in these little towns,
11 what are the chances of us getting monitoring stations
12 that will actually monitor those toxins?

13 MR. ROMAINE: To be honest, very small.

14 MS. BATES: That's what I thought.

15 MR. ROMAINE: And to the extent that you have
16 Superfund sites, monitoring is done as part of the
17 remediation program. So to the extent there is a concern
18 about release of contaminant at that point through the
19 remediation process, then the issue for dust, whatever
20 they're remediating. Is it concerns over dust, what are
21 the present measures that are used for those remediation
22 projects.

23 MS. BATES: In addition, the last -- let's
24 see -- I think it's the Eagle Creek there, they are
25 working on on the Superfund, they're trying to contain it

1 all in one small area, about 35 acre area on that site,
2 but at the last hearing they ran out of money. They're
3 not going to be able to finish that. They're going to
4 have to wait until more funds come in, so there's that.

5 MR. ROMAINÉ: We're not familiar with that.
6 What is the issue of contamination?

7 MS. BATES: It's smelting.

8 MR. ROMAINÉ: Is it air contamination, is it
9 ground water contamination?

10 MS. BATES: I think it's both.

11 MR. ROMAINÉ: So have they completed the
12 sealing of the site to prevent loss of dust?

13 MS. BATES: I don't think so. Do you know?

14 HEARING OFFICER: We're starting to get into
15 something that is quite a ways irrelevant to this
16 permitting proceeding, so I'm going to ask that we come
17 back to the permit.

18 MR. REED: You're probably concerned with
19 some of the airborne dust being kicked up from heavy
20 equipment working on the property.

21 MS. BATES: Yeah. There are four sites
22 there, four sources, but we have no monitoring sites here
23 is what I'm getting at.

24 MR. REED: Yeah. As Chris had suggested, the
25 Bureau of Land is what regulates those for the Agency,

1 and we work for the Bureau of Air. We would have to go
2 back and look and see if there is any Superfund
3 monitoring that's going on that would monitor dust-type
4 emissions from the site. So we just don't have the
5 answer for you here tonight.

6 MS. BATES: Okay. Had I thought about it, I
7 would have been better prepared, but there is -- and I'll
8 put it in a letter I send in before the 17th, but there
9 has been some complaints from other Coffeen residents
10 that were not addressed, and I will address those in my
11 next letter. They did some testing. I don't know if
12 you're -- are you familiar with them?

13 MR. REED: I'm not familiar with any testing
14 outside of air, so air pollution sources.

15 MS. BATES: Okay. Sorry I'm not prepared for
16 that.

17 HEARING OFFICER: That's okay.

18 MS. BATES: It just occurred to me.

19 MR. REED: No, we appreciate your
20 participation.

21 MS. BATES: We need to be talking about that.
22 There is -- and I will bring this up now, because I
23 haven't found anybody that can answer this question. I'm
24 sure you can't either, but about three years ago I was
25 working at Bremer Sanctuary and they had two classes of

1 middle school students, two separate classes, and they
2 came out, they were special classes of low learners. And
3 I asked the teachers at the time if that was due to the
4 Coffeen plant, the Ameren plant, living so close, and
5 they all said no, it was nothing to do with it, but I
6 can't believe there's -- that was about 50 students, I
7 figure about 25 students in each class, but that's a lot
8 of students that are low learners. And I think that's
9 some of the symptoms of toxins, but nobody has been able
10 to admit it or even know anything about it, but I suspect
11 it.

12 MR. REED: I don't have a good answer for
13 you, ma'am.

14 MS. BATES: I know.

15 MR. REED: I'm not a toxicologist, so I
16 wouldn't even want to --

17 MS. BATES: But it's something to think
18 about.

19 MR. REED: -- venture to try to answer your
20 question.

21 MS. BATES: When this permit specifically
22 says mercury, arsenic and chromium, if I go to the
23 toxicology reports on that, what would I find? What
24 would those symptoms be?

25 MR. REED: Again, I really --

1 HEARING OFFICER: We don't have toxicologists
2 here, so we'll have to check that with the agency.

3 MS. BATES: I wanted to bring it up so that
4 -- I wanted to get it into the record so we can all be
5 thinking about that because we'll be looking at that.

6 MR. REED: I will give you this answer. The
7 USEPA has recently promulgated new air pollution
8 regulations that target mercury and other air toxin
9 pollutants. It's called the MATS rule. It's in its
10 infancy right now and there is a future compliance date,
11 but these facilities will have to comply with those and
12 there are requirements in there for the heavy metals
13 you're speaking of and mercury and the others. So there
14 are regulations that are going into effect today being
15 implemented by the USEPA and our agency to regulate
16 those.

17 MS. BATES: Now, how would we know if they're
18 meeting those regulations? Because there are no
19 monitors. Would I call John and ask him for -- what
20 would you have? Would you have something that tells me
21 if those exceedances were on record?

22 MR. CASHMAN: I wouldn't, no.

23 MR. REED: Well, I think you're speaking of
24 two separate things. One, there are things called
25 national ambient air quality standards, which there are

1 none for heavy metals, but there are for particulate
2 matter, and heavy metals are a form of particulate, and
3 so there would be exceedances as a statewide type of
4 system of the national ambient air quality standards.
5 But then what I was speaking of under the MATS was the
6 permit that we are working on here today that's at the
7 hearing, during what we call a reopening of this permit,
8 which is already in process for this facility and will be
9 for the future facilities as well, to incorporate those
10 new requirements, those will be addressed in the permit
11 and the permit will specify what a source has to do to
12 demonstrate compliance with those limitations that are in
13 rule.

14 MS. BATES: But will that do any good if it's
15 statistically insignificant?

16 MR. REED: I guess I don't understand. I'm
17 not following that question, ma'am.

18 MS. BATES: Well, it's such a small
19 population is what I'm saying. There are no monitors.

20 MR. REED: Well, the rule has nothing to do
21 with the population. The rule is subject to the source
22 category. So every power plant in the entire country
23 will have to comply with these rules.

24 MS. BATES: But where would I get that
25 information? Who would --

1 MR. REED: Information on the rule?

2 MS. BATES: Right.

3 MR. REED: Or information on --

4 MS. BATES: How would I find out -- who would
5 I -- what department would I send the FOIA to to get that
6 information if they are exceeding those?

7 MR. REED: Well, the rule isn't in effect
8 yet, so there's nothing to exceed, but it will be. It's
9 a future compliance thing, and when the rule is in
10 effect, you can FOIA our agency who receives all the
11 compliance reports and reviews those compliance reports
12 to determine whether or not the source is in compliance
13 with those requirements. You could FOIA that data if you
14 wanted to and we can provide that.

15 MS. BATES: Is that something that would be
16 on the internet that I could just download?

17 MR. REED: I don't believe that we have any
18 compliance reporting information on the internet.

19 MS. BATES: So that we would have to go
20 through a FOIA?

21 MR. REED: You would need to request it
22 through FOIA, yes.

23 MS. BATES: That's all the questions I have.
24 Thank you.

25 HEARING OFFICER: Thank you. For the record,

1 the last name is spelled B-a-t-e-s. Is there anyone else
2 that has any comments or questions this evening? All
3 right. I want to remind everyone that the record in this
4 matter will be open until the 17th of December, and I
5 appreciate your attendance and participation this
6 evening. Thank you. This hearing is adjourned.

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8 (The hearing was adjourned at approximately 8:20 P.M.)

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CERTIFICATE OF REPORTER

I, BETH O. ZINK, a Registered Professional Reporter, Missouri Certified Court Reporter, Illinois Certified Shorthand Reporter and Notary Public within and for the State of Illinois, do hereby certify that the foregoing proceedings were taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were taken, and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Notary Public within and for the
State of Illinois, ILCSR#084-004477
MOCCR#799

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