



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 08 2013

Bob Bernoteit
Acting Permit Section Manager
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bernoteit:

The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's (IEPA) draft of the Clean Air Act Program (CAAPP) permit for the City of Springfield, Dallman Generating Station operated by the City's utility department, City Water, Light & Power (CWLP) located at 3100 Stevenson Drive, Springfield, Illinois (Permit No. 95090091). We appreciate your efforts in working with us towards the common goal of issuance of a CAAPP permit that is clear, enforceable and consistent with the Clean Air Act. Our comments are as follows:

- 1. The draft CAAPP permit does not specify a minimum set of control measures to be applied to coal handling and processing equipment to assure continuous compliance with applicable opacity and particulate matter (PM) limits.**

The draft CAAPP permit requires the Permittee to implement and maintain "established" control measures to minimize visible emissions (VE) of PM from coal handling and processing equipment, and provide assurance of compliance with the applicable emission standards in Conditions 7.3.4 and 7.4.4.¹ The draft permit states that "[e]stablished" control measures *may* include enclosure, natural surface moisture, application of dust suppressant, use of dust collection devices, and provide for different control measures depending on circumstances." Condition 7.3.6(a)(i) (emphasis added). The draft permit further requires the Permittee to submit to IEPA a record of the established control measures for each of the affected operations within 60 days of permit issuance.²

As written, the draft CAAPP permit does not require the Permittee to use any specific control measures for coal handling and processing equipment. The draft permit allows the Permittee to select any type of control measure(s), and provides the Permittee discretion to change those

¹ See Conditions 7.3.6 and 7.4.6.

² See, e.g., Condition 7.3.9(b)(ii) and (iii).

control measures. Therefore, the draft CAAPP permit does not comply with 40 C.F.R. § 70.6(a) because it does not contain sufficient operational requirements to assure compliance with the applicable opacity and PM limits for coal handling and processing equipment.³ In addition, the draft permit does not provide the public with the opportunity to meaningfully comment on the selected control measures.

We recommend that IEPA revise Conditions 7.3.6(a)(i) and 7.4.6(a)(i) to specify the minimum set of control measures for the coal handling and processing equipment. Additionally, Conditions 7.3.9(b)(i) and (ii) and 7.4.9(b)(i) and (ii) should be revised to require review and approval by IEPA of the control measures selected by the Permittee and revised to provide the pertinent information on the control measures (description, frequency, and other information necessary to demonstrate compliance with applicable limitations). Since the current permit will require the submittal of full documentation to support the selected control measures to show compliance with all applicable requirements, IEPA should incorporate the specific control measures corresponding to each emission point into the permit during the planned reopening for cause process.⁴

2. The frequency of the required VE observations from coal handling equipment, coal processing equipment, gypsum and limestone handling equipment, and fly ash equipment is inadequate to assure continuous compliance with applicable opacity and PM limits.

The draft CAAPP permit contains inspection requirements for the coal handling, coal processing, gypsum/limestone handling, and fly ash equipment.⁵ These include monthly inspections of the coal handling, coal processing and gypsum/limestone handling equipment, and weekly inspections of the fly ash equipment. In addition, the draft permit requires that the Permittee perform VE observations using EPA Reference Method 22 once per calendar year.

Given that the majority of the affected equipment operates regularly throughout the year, it is not clear how the draft CAAPP permit inspection requirements and frequency of the required VE observations are adequate to yield reliable and accurate emissions data, as required by 40 C.F.R. § 70.6(a)(3)(i)(B), with respect to the applicable opacity and process weight rate PM limits. During the planned reopening process, once IEPA has the information regarding the control measures discussed in Comment 1, Conditions 7.3.8(b), 7.4.8(b), 7.5.8(b), and 7.6.8(b) should include additional monitoring and/or testing to yield the reliable data that assures compliance on

³ This comment does not apply to the requirements for the fly ash, limestone and gypsum handling equipment because the draft permit includes specific "established" control measures for that equipment at Conditions 7.4.6.a.i. and 7.5.6.a.i..

⁴ We note that IEPA recently provided EPA with a Fugitive Dust Control Plan (FDCP), dated March 2010, for the Dallman Unit 4 Project at the CWLP plant. This FDCP appears to contain control measures specific to each coal handling process for the Dallman Unit 4 project. It is unclear whether IEPA has approved this FDCP or included it in the permit record. If IEPA has approved the 2010 FDCP, and if similar FDCPs for other operations at the facility exist, IEPA should include in the current permit the control measures listed in the FDCPs or, alternatively, incorporate the FDCPs into the permit by reference so that the control measures are practically enforceable.

⁵ See, generally, Conditions 7.3.8, 7.4.8, 7.5.8, and 7.6.8.

a continuous basis. Also, IEPA should provide in the permit record an explanation of how the control measures and monitoring requirements for each transfer point, coal pile, conveyor belt, and other points of fugitive emissions will assure compliance with all applicable opacity and PM limits. This should include a discussion of the relationship between monitoring frequency and applicable emission limits.

We provide these comments to ensure that the permit meets all applicable federal requirements and provides necessary information to the public, and that the record contains adequate support for the permit decision.

We look forward to working with you to address these comments. If you have any further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,



Genevieve Damico
Chief
Air/Permits Section