



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



REPLY TO THE ATTENTION OF:

Edwin C. Bakowski, P.E.
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has reviewed the draft Renewal Clean Air Act Permit Program (CAAPP) permit (Application No. 03080009) prepared by the Illinois Environmental Protection Agency (IEPA) for Ameren Energy Generating Company, Elgin Energy Center, located at 1559 Gifford Road, Elgin, Illinois. EPA has the following comments on the draft CAAPP permit:

1. The Statement of Basis (Project Summary) does not adequately explain the relationship between the draft CAAPP permit and previous CAAPP operating permits issued by IEPA to the facility. From our discussions with IEPA, we understand that the draft CAAPP permit is a significant modification to CAAPP Permit No. 03080009, issued March 20, 2009. However, a discussion of such a relationship is missing from both the draft CAAPP permit and the Project Summary. At a minimum, the Project Summary needs to clearly explain:
 - a. the requirements of the original permit that are being changed and why they are being changed;
 - b. whether or not any newly applicable requirements (since the last permit was issued) are being addressed in the significant modification; and
 - c. the current compliance status of the source with respect to all applicable requirements.
2. Neither the draft CAAPP permit nor the Project Summary addresses the applicability of CAAPP permitting requirements to Greenhouse Gas (GHG) emissions from the source. Condition 5.1.1. states that the source is a major source of Nitrogen Oxides (NO_x) and Carbon Monoxide (CO) emissions. Please clarify whether or not the source is also major for GHGs.

3. The draft CAAPP permit provides conflicting information on how compliance with certain numerical emission limits will be demonstrated. According to Condition 7.1.6(b)(i), compliance with the hourly emission limits in Condition 7.1.6(b)(i) shall be based on average emissions determined by emissions testing (3-run average) or emissions monitoring (24-hour average). Condition 7.1.6(c) explains that compliance with the annual limits in Condition 7.1.6(b)(iii) will be based on monthly emissions data, which will presumably be based on the same data used to verify compliance with Condition 7.1.6(b)(i). However, the testing requirements in Condition 7.1.7 appear to only apply to NOx, Oxygen and opacity. Test methods and procedures have not been specified for CO, Sulfur Dioxide (SO₂), Volatile Organic Material (VOM) and Particulate Matter (PM/PM₁₀), which makes it difficult to determine how the source will demonstrate compliance with CO, SO₂, VOM and PM/PM₁₀ emission limits as required by Condition 7.1.6(b)(i). Moreover, Conditions 7.1.6(e) and 7.1.12(e)(ii) appear to suggest that the source can use other options (besides stack testing) for demonstrating compliance with the numerical emission limits. Please clarify how compliance with the numerical emission limits in Conditions 7.1.6(b)(i) and 7.1.6(b)(iii) will be demonstrated.

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision. We look forward to working with you to address all of our comments. If you have any questions, please feel free to contact me at (312) 353-4761 or David Ogulei, of my staff, at (312) 353-0987.

Sincerely,



Genevieve Damico
Chief
Air Permits Section