



United States Environmental Protection Agency
Regional Administrator
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

JUN 12 2012

John Kim, Interim Director
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Dear Mr. Kim:

I am taking the extraordinary step of writing this letter in the hope that you will work with us to reconsider decisions you made when finalizing the permit that IEPA recently issued to Christian County Generation for the Taylorville Energy Center. While EPA Region 5 plans to formally weigh in on the appeal of this permit to the Environmental Appeals Board, I am reaching out now to see if there are ways we might work together to avoid a lengthy permit appeal that could delay construction of this facility and undermine state and federal efforts to promote clean coal technology.

IEPA appears to have rejected the use of carbon capture and sequestration (CCS) technology at the Taylorville facility, even though Christian County Generation is actively seeking permits to construct and operate a carbon capture and sequestration system. EPA guidance recognizes that CCS is technically feasible at this type of facility and there are many ways that IEPA could have addressed any possible uncertainties about the feasibility of implementing a CCS system for the Taylorville project. For example, IEPA could have included an adjustable BACT limit contingent on the level of sequestration achieved or a fixed BACT limit based on a specific level of sequestration, with the possibility of revising that limit in the future if CCS was not actually achieved at anticipated levels once operation commenced. If IEPA would now like to consider these options and other ideas, we stand ready to support you in this effort.

When the Clean Coal Portfolio Standard Law was signed into law in January 2009, Illinois positioned itself as a leader in promoting clean coal and renewable energy, and demonstrated a strong commitment to new technologies that can drive a green economy. As someone personally engaged in the drafting of that legislation, I was hopeful that our state could attract CCS proposals similar to the Taylorville Energy Center. Today, in my position as EPA Regional Administrator I remain optimistic that Illinois can retain its leadership in clean coal technology, but I am concerned that permit delays could prevent the state and this region from realizing the promise of investments in our green economy.

If you wish to work collaboratively with EPA Region 5 on this or any upcoming CCS projects, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read "S Hedman".

Susan Hedman
Regional Administrator