



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

AIR AND RADIATION DIVISION  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

November 9, 1999

REPLY TO THE ATTENTION OF:  
AR-18J

Don Sutton, Manager  
Permit Section  
Bureau of Air  
Illinois Environmental Protection Agency  
P. O. Box 19276  
1021 North Grand Avenue East  
Springfield, Illinois 62702-9276

Dear Mr. Sutton:

This letter is in response to your October 22, 1999, letter requesting guidance on the treatment of nitrogen oxides (NO<sub>x</sub>) emission reductions at the Electric Energy, Inc. (EEI) power generating station in Joppa, Illinois. The question posed in the letter is whether actual emissions outside of the contemporaneous period may be used to establish the amount of creditable decrease available to the company.

In limited circumstances, this may be allowed. Page A.50 (Figure A-2) of the 1990 Draft New Source Review (NSR) Workshop Manual describes such a case. For a reduction to be creditable, it must be attributable to a physical change that occurred during the contemporaneous period, in addition to meeting certain other criteria. The amount of credit is then determined using a "baseline" of the two-year average emissions immediately prior to the change.

In reading EEI's October 1, 1999 letter to your office, a different issue emerges. The question EEI seems to be asking is whether the decreases that took place from 1992 to 1995 may be counted as contemporaneous. Over a period of several years, EEI successively modified each of their existing coal-fired boilers to achieve a NO<sub>x</sub> emissions level well below the 0.45 lb/mmBtu limit required by Title IV. Although EEI is aware that the reductions taken to comply with acid rain requirements are not creditable, they would like to know what fraction of the excess reductions are creditable.

As described in the NSR Workshop Manual on page A.37, to be contemporaneous, an emissions increase or decrease must occur between the date the emissions increase from the new or modified unit occurs, and the date 5 years prior to the scheduled commencement of construction of that unit. For example, if construction on a project

were scheduled to commence during January 2000, the beginning of the contemporaneous period would be January, 1995.

EEI states in their letter that they completed their NO<sub>x</sub> and sulfur dioxide (SO<sub>2</sub>) emissions reduction program in April, 1995. Once they have calculated the contemporaneous period for their planned project, they should evaluate any physical modification that occurred at the facility within that period for its impact on net emissions. Based on information in EEI's letter, the United States Environmental Protection Agency sees a span of several months in 1995 where some reductions may be creditable for purposes of netting out of Prevention of Significant Deterioration review for NO<sub>x</sub>.

I hope this letter has provided clear and useful information. If you have any further questions, please contact Lauren Steele, of my staff, at (312) 353-5069.

Sincerely yours;

Pamela Blakley, Acting Chief  
Permits and Grants Section (IL/IN/OH)