



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

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June 30, 2016

Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency, Region V (R-19J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Dear Administrator Kaplan:

On behalf of Governor Rauner, the Illinois Environmental Protection Agency (Illinois EPA) is hereby notifying the U.S. Environmental Protection Agency (USEPA) whether ambient monitoring or air dispersion modeling will be used to characterize sulfur dioxide (SO₂) air quality for those facilities previously listed (correspondence to Dr. Susan Hedman dated January 12, 2016) as exceeding the 2,000 tons per year emissions threshold and/or warranting air quality characterization under the *Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)* (80 FR 51052). Some of the listed facilities were previously modeled as part of the ongoing 1-hour SO₂ NAAQS implementation process. Others have or will undergo large and permanent SO₂ emission reductions because of permitting activity or a recent state rulemaking. For these latter facilities, further air quality characterization is not warranted. The Illinois EPA's selections for modeling, monitoring, or no air quality characterization at all are provided in the table on the following page.

Accompanying this required notification of facilities to be characterized through ambient monitoring or air dispersion modeling is a supporting document that provides a proposed modeling protocol for each facility that will be modeled. These protocols are required to be submitted to USEPA by July 1, 2016, as stipulated in the *Data Requirements Rule*. The proposed methodology for each facility is provided in considerable detail, so as to facilitate USEPA review and any potential follow-up discussion between our two agencies. It is understood that any individual protocol may change based upon newly acquired information, any technical impediments encountered in implementing the proposed methodologies, and/or any potential changes recommended by USEPA to this initial submittal.

Facility	Location	Method of Characterization
Kincaid Generation LLC	Christian County	Modeling
Rain CII Carbon LLC	Crawford County	Modeling
Midwest Generation LLC - Waukegan	Lake County	Modeling
Dynegy Midwest Generation LLC - Baldwin	Randolph County	Modeling
Prairie State Generating Company, LLC	Washington County	Modeling
U.S. Steel Corporation - Granite City Works / Gateway Energy & Coke Company LLC	Madison County	Modeling
Archer Daniels Midland Company	Macon County	Monitoring
Tate & Lyle Ingredients Americas LLC	Macon County	Monitoring
DTE Tuscola LLC*	Douglas County	(Not needed)
Midwest Generation LLC - Joliet**	Will County	(Not needed)
Illinois Power Generating Company - Newton***	Jasper County	(Not needed)
Dynegy Midwest Generation LLC - Wood River***	Madison County	(Not needed)
Electric Energy, Inc.***	Massac County	(Not needed)
Dynegy Midwest Generation LLC - Hennepin***	Putnam County	(Not needed)
Southern Illinois Power Cooperative - Marion***	Williamson County	(Not needed)
<p><i>*As of January 30, 2016, the coal-firing capability of this facility's boilers was eliminated, resulting in dramatically lower SO2 emissions.</i></p> <p><i>**IPCB-adopted rulemaking R15-21 requires boiler fuel conversion that will effectively eliminate significant SO2 emissions from this source.</i></p> <p><i>***This facility was specifically covered by the March 2015 consent decree (USEPA and Sierra Club/Natural Resources Defense Counsel).</i></p>		

If there are any questions, please feel free to contact David Bloomberg of my staff at david.bloomberg@illinois.gov or 217-524-4949.

Sincerely,



Lisa Bonnett, Director
Illinois Environmental Protection Agency