East-West Gateway Council of Governments
Air Quality Advisory Committee

Illinois SO_2 120-Day Letter

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SO_2 NAAQS – Current Nonattainment Areas

- Two Current Illinois Nonattainment Areas for 2008 SO_2 NAAQS
  - Peoria/Pekin area & Lemont area

- SO_2 rules approved and submitted as SIP revision to USEPA – Illinois <u>not</u> listed in USEPA's Finding of Failure to Submit earlier this month.
  - Statewide rule for sulfur content in fuel oil.
  - Specific limits for "culpable" sources of nonattainment within and near the two NAAs.
  - Lemont area already monitoring in attainment.

Consent Decree Sources

Illinois EPA evaluated five large EGUs and their surrounding areas under the USEPA/Sierra Club Consent Decree. These were the State's recommendations:

Facility (Location)	Designation	Areal Extent of Designation Recommendation
Newton Power Station (Jasper County)	Attainment	Jasper County
Hennepin Power Station (Putnam County)	Attainment	Putnam County, Bureau County
Joppa Steam Coal Power Plant (Massac County)	Attainment	Massac County
Marion Power Station (Williamson County)	Attainment	Williamson County
Wood River Power Station (Madison County)	Nonattainment	Area east of Corporal Belchik Memorial Expressway, south of East Broadway, south of Route 3, and north of Route 143 in Alton Township.
	Attainment	All of Wood River Township, and the area north of Cahokia Diversion Channel in Chouteau Township.
	Unclassifiable	Remainder of Madison County.

Proposed Nonattainment Area Boundary for the Wood River Study Area

USEPA 120-Day Letter

- USEPA's 120-Day Letter agreed with *most* of Illinois' recommendations.
- However, USEPA proposed that Williamson County, in which SIPCO is located, be designated Nonattainment.
  - Original plan was to set up a permit limiting emissions to modeled levels. However, that was not done before USEPA issued 120-Day Letters, so USEPA said they had to rely on Sierra Club modeling showing nonattainment.

Planned Response to 120-Day Letter

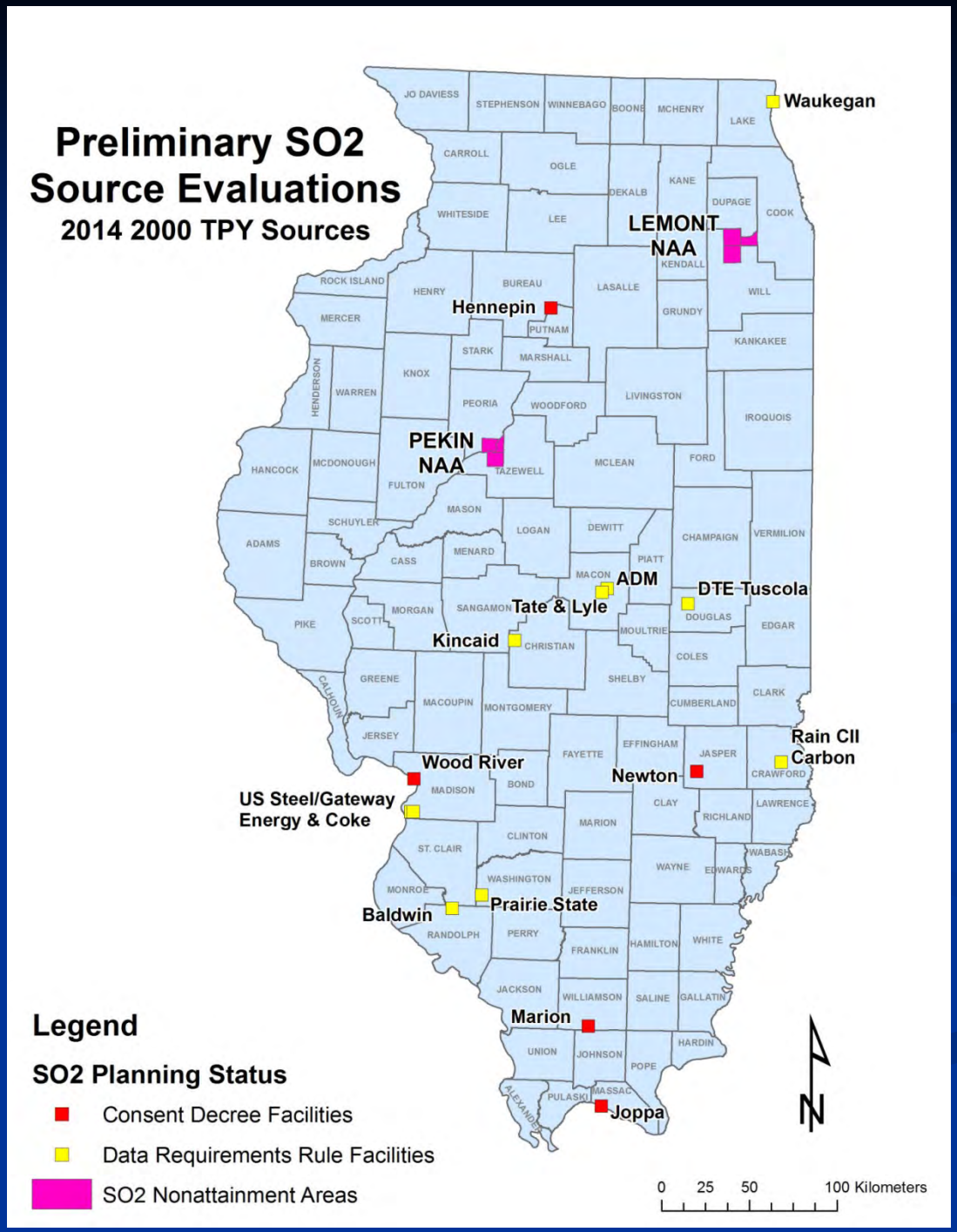
- Illinois EPA and SIPCO are working on several possibilities for responding to USEPA.
  - Corrections to modeling may demonstrate attainment.
    - Building dimensions, plume characteristics, etc. being fixed after review of information.
  - Possible use of permit limits if necessary.

Data Requirements Rule

- Evaluation has begun on additional areas for the Data Requirements Rule.
- Letter submitted with list of facilities & areas to be characterized:
  - Kincaid Generation, Christian County
  - Rain CII Carbon, Crawford County
  - Midwest Generation Waukegan, Lake County
  - Dynegy Baldwin, Randolph County
  - Prairie State Generating, Washington County
  - U.S. Steel Granite City/Gateway Energy & Coke, Madison County
  - ADM and Tate & Lyle, Macon County
  - DTE Tuscola, Douglas County (switched to natural gas)

For DRR sources, monitoring and/or modeling will determine which new areas become nonattainment.

Modeling is the default. Only one area likely to monitor.



Thank You

- Any Questions?

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