



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

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January 14, 2016

Dr. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency, Region V (R-19J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Dear Dr. Hedman:

On behalf of Governor Rauner, the Illinois EPA hereby submits the list of facilities for sulfur dioxide (SO₂) air quality characterization as stipulated in the *Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)*, which was published in the *Federal Register* on August 21, 2015.

This list of facilities, below, was prepared based upon company-reported actual SO₂ emissions for calendar year 2014, which is the most recent year of certified emissions data available to the Illinois EPA. With the exception of two facilities, which are treated as a “single source” under Clean Air Act Title V permitting, each of the facilities individually exceeded the 2,000 tons per year SO₂ emissions threshold specified under the Data Requirements Rule. Five of these facilities met the criteria specified in the March 2015 consent agreement, between USEPA and Sierra Club/Natural Resources Defense Council, to be addressed in an earlier round of SO₂ designations, for which the Illinois EPA provided designation recommendations for the areas associated with these five facilities in a letter to USEPA dated September 18, 2015. Another source, Midwest Generation – Joliet, has been addressed in a rulemaking adopted by the Illinois Pollution Control Board that will soon be submitted to USEPA as a SIP revision. This rulemaking requires conversion of the Joliet units to fire a fuel other than coal, necessarily greatly reducing SO₂ emissions, likely eliminating any need for modeling.

To address the potential issue of smaller sources “clustering” into groups that exceed 2,000 tons per year of SO₂, the Illinois EPA investigated sources in geographic proximity throughout the State. In examining such sources and their emissions, it was determined that there are no areas of source congregation in which individual sources are below 2,000 tons per year but total emissions of proximate sources exceed 2,000 tons per year. (The only situation where this could have been considered to occur was with U.S. Steel and Gateway Energy in Granite City, but the Illinois EPA Bureau of Air already considers these entities a “single source” for permitting purposes.)

4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 608-3131
2125 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Mall St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
412 SW Washington St., Suite D, Peoria, IL 61602 (309) 671-3022
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601

The facilities for which Illinois EPA will be doing SO₂ air quality characterization are:

| Facility | Location | Annual Emissions (tons SO ₂ per year) |
|---|-------------------|---|
| Kincaid Generation LLC | Christian County | 2,818 |
| Rain CII Carbon LLC | Crawford County | 5,427 |
| DTE Tuscola LLC | Douglas County | 9,677 |
| Midwest Generation LLC - Waukegan | Lake County | 7,683 |
| Dynegy Midwest Generation LLC - Baldwin | Randolph County | 4,406 |
| Prairie State Generating Company, LLC | Washington County | 5,696 |
| Midwest Generation LLC - Joliet* | Will County | 12,800 |
| U.S. Steel Corporation - Granite City Works / Gateway Energy & Coke Company LLC | Madison County | 1,335 / 1,180 |
| Archer Daniels Midland Company | Macon County | 9,961 |
| Tate & Lyle Ingredients Americas LLC | Macon County | 4,379 |
| Illinois Power Generating Company - Newton** | Jasper County | 16,417 |
| Dynegy Midwest Generation LLC - Wood River** | Madison County | 7,122 |
| Electric Energy, Inc.** | Massac County | 18,287 |
| Dynegy Midwest Generation LLC - Hennepin** | Putnam County | 3,961 |
| Southern Illinois Power Cooperative - Marion** | Williamson County | 8,651 |

* IPCB-adopted rulemaking R15-21 requires boiler fuel conversion that will effectively eliminate significant SO₂ emissions from this source.
 ** Addressed in Illinois EPA's September 18, 2015, designation recommendation letter.

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

Sincerely,



Lisa Bonnett, Director
 Illinois Environmental Protection Agency