



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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RENEE CIPRIANO, DIRECTOR

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March 19, 2003

Mr. Thomas V. Skinner  
Regional Administrator  
U.S. Environmental Protection Agency, Region V  
77 West Jackson Boulevard, R-19J  
Chicago, Illinois 60604-3507

Re: Scope of Evaluation of Best Available Control Technology (BACT)  
Integrated Gasification Coal Combustion (IGCC)

Dear Mr. Skinner. *Tom:*

The purpose of this letter is to inform the USEPA of a recent action taken by the Illinois EPA in administering the federal rules for Prevention of Significant Deterioration of Air Quality (PSD), 40 CFR 52.21. As you know, pursuant to a delegation agreement with the USEPA, the Illinois EPA processes applications for PSD permits for sources located in Illinois.

Over the last few months, the Illinois EPA has been reviewing whether Integrated Gasification Coal Combustion (IGCC) must be considered as part of the Best Available Control Technology (BACT) demonstration supplied in the PSD application for a proposed coal-fired power plant in Illinois. We have concluded that it is appropriate for applicants for such plants to consider IGCC as part of their BACT demonstrations. In this regard, IGCC is an alternative production process that can be used with coal to produce electricity. General guidance previously provided by the USEPA states that "there may be instances where, in the permit authority's judgment, the consideration of alternative production processes is warranted and appropriate for consideration in the BACT analysis." We have concluded that this is such a circumstance.

Attached for your information is a copy of a letter that was recently sent to Indeck-Elwood LLC, formally notifying it of the need to address IGCC as part of its BACT demonstration.

If you have further questions on this matter, please contact Don Sutton, Acting Manager,  
Division of Air Pollution Control, Bureau of Air.

Sincerely,

A handwritten signature in cursive script, appearing to read "Renee Cipriano", with a long horizontal flourish extending to the right.

Renee Cipriano, Director

RC:DS:CR:kk

Attachment

cc: Pamela Blakley, USEPA Region 5