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**From:** Bennett, Tate [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1FA92542F7CA4D01973B18B2F11B9141-BENNETT, EL]  
**Sent:** 4/25/2017 1:30:35 PM  
**To:** Rashid G. Hallaway [rhallaway@hhqventures.com]  
**Subject:** Re: Topics for tomorrow Am

Please give them my cell: **Ex. 6** and tell them to come to the North building and to give me a call if security gives them a hard time.

On Apr 24, 2017, at 8:45 AM, Rashid G. Hallaway <[rhallaway@hhqventures.com](mailto:rhallaway@hhqventures.com)> wrote:

Thanks again for taking time to meet tomorrow. Below is a summary from Southern Illinois Power Cooperative for your review. The summary shows how a small, G&T Cooperative power plant became embroiled with EPA on a NAAQS issue:

In late October/early November of 2015, SIPC received a call from David Bloomberg of IEPA regarding their modeling that showed Williamson County, IL as non-attainment with the 1-hr. SO<sub>2</sub> NAAQS. He wanted SIPC to agree to a construction permit for a lower allowable (permit) SO<sub>2</sub> rate from our boilers; approximately 50% lower! He asked that we decide within 3 days whether or not we would agree with such a reduction. We responded saying we needed to check their data, and we asked for it to be forwarded to us. We also called Bob Paine at AECOM for assistance in re-modeling what IEPA was claiming.

During the course of that re-modeling, we found a number of errors in the data used by IEPA (and, ostensibly by outside interest groups). These errors were corrected & modeling performed by AECOM. Without corrections to the model for a moist plume, low wind, etc.; the modeling showed slightly non-attainment, but then we noted that it was only within the plant boundaries. A meeting was quickly scheduled with IEPA on December 17, 2015 to show the corrected modeling results to IEPA for their submission to USEPA. Our information was NOT passed along to USEPA by IEPA, and on February 17, 2016 USEPA reported its intent to find Williamson County, IL as non-attainment for NAAQS SO<sub>2</sub>.

On March 30, 2016 SIPC submitted comments to EPA upon their finding and included modeling from AECOM as support for our claim of attainment. On April 19, 2016 IEPA submitted comments to USEPA supporting our claim of attainment. Subsequent to IEPA's comment to USEPA, on about May 20, 2016, we received a call from David Bloomberg & Jim Ross saying USEPA had reservations as to whether we controlled our northern boundary at the Marion Station, and IEPA requested we send them information about how that area was controlled.

On May 27th SIPC responded to Bloomberg & Ross with information of how the area is monitored & pictures of how it was controlled. Our next notification was when USEPA published that it planned to show Williamson County as non-attainment, and that it used the Sierra Club modeling and the lack of control of our northern property as reasons receptors in that northern area could be used to show non-attainment. We have appealed that designation & asked for reconsideration. The reconsideration request was denied by EPA on 12/15/16.

On Apr 24, 2017, at 8:26 AM, Bennett, Tate <[Bennett.Tate@epa.gov](mailto:Bennett.Tate@epa.gov)> wrote:

Any idea what they want to discuss?