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Dept of Environmental Management
Office of Air Quality

February 19, 2013

Mr. Phil Perry
Compliance Branch Chief, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Ave.
Indianapolis, IN 46204-2251

Re: Indianapolis Power & Light Company (IPL) – Petersburg Generating Station
Source ID: 125-0002
New Source Review Post-Project Emissions Submission

Dear Mr. Perry:

Indianapolis Power & Light Company (IPL) is submitting actual annual emissions data for Units 1, 2, 3, and 4 at IPL - Petersburg Generating Station, located at 6925 N. State Road 57, Petersburg, Indiana, pursuant to 326 IAC 2-2-8(b)(4) and 326 IAC 2-3-2(l)(4). (Attachment A)

IPL believes that the underlying projects were not major modifications and, therefore, are not subject to the New Source Review (NSR) program. In light of the uncertainty associated with the applicability of the NSR program, however, IPL submitted notices to IDEM before implementing the work on each unit and IPL hereby submits this letter and report.

For NSR to apply, the emissions unit must undergo a "major modification"—a physical or operational change that results in an emissions increase. (326 IAC 2-2-2; 326 IAC 2-3-2). A project that is routine maintenance, repair and replacement is, however, specifically excluded from the definition of major modification, irrespective of its impact on emissions. (326 IAC 2-2-1(ee); 326 IAC 2-3-1(y)).

Because the type of work included in the notices is done routinely and the material costs are minimal for each of the projects, IPL concluded that NSR does not apply. These activities were not "major modifications" because they qualify as routine under the routine maintenance, repair and replacement exclusion. (326 IAC 2-2-1(ee)(2)(A); 326 IAC 2-3-1(y)(A)).

Nevertheless, since IPL submitted pre-project notifications, the company also is submitting the post-project annual emissions consistent with 326 IAC 2-2-8(b)(4) and 326 IAC 2-3-2(l)(4).

Should you have any questions regarding this submittal, please contact Angelique Oliger at (317) 261-5852.

Sincerely,

Angelique Oliger
Corporate Affairs, Sr. Environmental Coordinator
Indianapolis Power & Light Company

Cc: Vickie Cordell, IDEM
Jeff Harter, IPL
Byron Taylor, Sidley Austin

enclosure

Attachment A: IPL Petersburg Generating Station
Units 1, 2, 3, and 4
2011 Actual Emissions

	Emissions (tons/yr)			
Pollutant	**Unit 1**	**Unit 2**	**Unit 3**	**Unit 4**
PM	309	393	977	632
PM-10	226	239	495	399
PM-2.5	173	239	328	347
SO2	2738	4866	4495	3315
NOx	1744	1555	1833	4096
VOC	20	31	36	43
CO	170	261	297	362
Lead	2.08E-02	6.28E-03	1.05E-01	1.10E-02
Beryllium	3.71E-04	2.24E-04	2.13E-03	1.99E-04
Mercury	3.01E-02	4.62E-02	5.24E-02	6.40E-02
Fluorides	36	55	63	77
H2SO4	22	34	155	190
CO2e	1,595,737	2,456,421	2,785,469	3,395,994

Copies to:

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