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DeptofEnvironmentalManagement
State of Indiana

February 26, 2014

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).

Finally, a variety of operational factors and conditions unrelated to any particular project may affect annual emission rates.

Should you have any questions regarding this submittal, please contact me at (937) 259-7376.

Sincerely,

JoAnne C. Rau
AES Environmental Policy

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

enclosure

Attachment A: IPL Petersburg Generating Station
Units 1, 2, 3, and 4
2014 Actual Emissions

	Emissions (tons/yr)			
Pollutant	**Unit 1**	**Unit 2**	**Unit 3**	**Unit 4**
PM	572	538	1507	772
PM-10	276	337	593	484
PM-2.5	210	292	391	420
SO2	18002	30459	9473	8318
NOx	1992	3040	3149	4853
VOC	25	37	42	52
CO	206	306	352	437
Lead	3.65E-02	1.33E-02	1.81E-01	1.91E-02
Beryllium	4.43E-04	3.01E-04	1.37E-03	4.32E-04
Mercury	3.64E-02	5.37E-02	6.20E-02	7.72E-02
Fluorides	44	65	75	93
H2SO4	26	38	44	219
CO2	1,922,808	2,844,436	3,279,867	4,077,626
CO2e	1,933,369	2,860,039	3,297,873	4,100,027