February 20, 2012

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 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). 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)).

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)).

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).

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: Dan Hancock, IDEM
Vickie Cordell, IDEM
Jeff Harter, IPL
Dwayne Burke, 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	239	450	1231	591
PM-10	175	278	623	373
PM-2.5	134	278	414	325
SO2	1395	2357	7569	13681
NOx	1516	2795	2277	3740
VOC	16	36	45	41
CO	132	303	374	340
Lead	1.61E-02	6.99E-03	1.33E-01	1.09E-02
Beryllium	3.00E-04	1.72E-04	2.66E-03	3.55E-04
Mercury	2.32E-02	5.38E-02	6.60E-02	5.98E-02
Fluorides	28	64	80	72
H2SO4	17	40	196	177
CO2e	NA*	NA*	NA*	3,181,429

*Units 1, 2, and 3 have not experienced an Outage since July 1, 2011 (implementation date of Phase II of GHG Tailoring Rule).