

July 18, 2008

Via Overnight Delivery

Dean Ponchak
Division of Air Pollution Control
Ohio EPA-SEDO
2195 Front Street
Logan, Ohio 43138



**RE: American Municipal Power Generating Station
MACT Confirmation Analysis**

Dear Dean:

On February 7, 2008, Ohio EPA issued a final PSD air permit to install to American Municipal Power-Ohio, Inc. ("AMP-Ohio") for AMP-Ohio's proposed American Municipal Power Generating Station ("AMPGS"). Subsequent to the issuance of the final PSD permit to install for AMPGS, the D.C. Circuit Court of Appeals vacated the Clean Air Mercury Rule.

As such, AMP-Ohio submits the attached Clean Air Act Section 112(g) hazardous air pollutant maximum achievable control technology analysis to confirm that the Best Available Control Technology and Best Available Technology requirements established for AMPGS in the final PSD permit to install also satisfy the case-by-case maximum achievable control technology requirements of OAC 3745-31-28, which were not applicable to AMPGS at the time of the issuance of the PSD permit to install.

Please do not hesitate to contact me, Scott Kiesewetter or Chuck Taylor with questions.

Randy Meyer
Director of Environmental Affairs
American Municipal Power-Ohio, Inc.

cc: Rod Windle
Bob Hodanbosi
Mike Hopkins
Scott Kiesewetter

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**CLEAN AIR ACT SECTION 112(g)
HAZARDOUS AIR POLLUTANT (HAP)
MAXIMUM ACHIEVABLE CONTROL
TECHNOLOGY (MACT) ANALYSIS**

**For:
AMERICAN MUNICIPAL POWER
GENERATING STATION**

**Submitted By:
AMERICAN MUNICIPAL POWER-OHIO, INC.**

July 2008

GT

Environmental, Inc.

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**CLEAN AIR ACT SECTION 112(g)
HAZARDOUS AIR POLLUTANT (HAP)
MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) ANALYSIS
FOR
AMERICAN MUNICIPAL POWER GENERATING STATION**

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SECTION 1

INTRODUCTION AND MACT SUMMARY

The Ohio Environmental Protection Agency (Ohio EPA) issued Permit-to-Install (PTI No. 06-08138) to American Municipal Power-Ohio, Inc. (AMP-Ohio) on February 7, 2008. PTI No. 06-08138 authorized the construction of a new pulverized coal-fired power plant known as the American Municipal Power Generating Station (AMPGS) in Meigs County, Ohio. At the time the PTI was issued, Hazardous Air Pollutants (HAPs) emissions from the two main boilers (emissions units B001 and B002) were limited by the following requirements:

- The federally enforceable provisions of the Ohio Clean Air Mercury Rule (CAMR) in Ohio Administrative Code (OAC) Chapter 3745-108;
- The federally enforceable standards for mercury emissions in 40 CFR Part 60, Subpart Da, Section 60.45Da; and
- Best Available Technology provisions that limit the total mercury emissions from each boiler to no more than 1.9 pounds per trillion Btu heat input as a 12-month rolling average and no more than 86 pounds per rolling, 12-month period.¹

The limitations in PTI No. 06-08138 conformed to the requirements of federal law at the time the permit was issued. These requirements were based on two related actions by the United States Environmental Protection Agency (US EPA): (1) On March 29, 2005 US EPA removed electric generating units (EGUs) from the Clean Air Act (CAA) Section 112(c) source category list; and (2) On May 18, 2005 US EPA promulgated the Clean Air Mercury Rule (CAMR) and established standards for mercury control pursuant to the CAA Section 111 NSPS.

Subsequent to the issuance of the PTI for the AMPGS, the United States Court of Appeals for the District of Columbia Circuit (DC Circuit) issued a final opinion in Case No. 05-1097. The DC Circuit's decision prompted the Ohio EPA to review the basis for the HAP emission limitations for the AMPGS in PTI No. 06-08138. Ohio EPA determined that an additional evaluation was warranted pursuant to Section 112(g)(2) of the CAA to confirm that the Best Available Control Technology (BACT) requirements established for the AMPGS were consistent with a case-by-case MACT determination pursuant to OAC rule 3745-31-28 Review of Major Stationary Sources of Hazardous Air Pollutants Requiring MACT Determinations (refer to Appendix A).

This MACT analysis for the AMPGS includes the following:

- A summary of the requirements of OAC rule 3745-31-28 (refer to Section 2);
- Information and data regarding the emissions units that are expected to have HAP emissions and the control systems and emissions limitations that constitute MACT (refer to Section 3);

¹ In the event that the limits are not practically and operationally achievable, AMP-Ohio may demonstrate that different mercury limitations are appropriate and obtain a modification from the Ohio EPA.