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Via Electronic Mail and Overnight Delivery



American Municipal
Power-Ohio, Inc.

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

Mr. Rod Windle
Division of Air Pollution Control
Ohio EPA – Central Office
50 West Town Street
Columbus, Ohio 43215

**RE: American Municipal Power Generating Station
Response to Questions Regarding 112(g) MACT Analysis and
Supplemental Information Regarding Auxiliary Boiler (B003)**

Dear Dean and Rod:

On July 18, 2008, American Municipal Power-Ohio, Inc. (AMP-Ohio) submitted a Clean Air Section 112(g) analysis for AMP-Ohio's proposed American Municipal Power Generating Station (AMPGS). On January 9, 2009, Rod sent me an electronic mail which included follow-up questions regarding AMP-Ohio's 112(g) analysis. This letter contains supplemental information regarding auxiliary boiler (B003) and responds to each question as follows:

Ohio EPA Question/Comment 1:

On page 5 of the 112(g) analysis dated July 18, 2008, there is a list of pollutants representing the expected HAPs. Is this a complete list of HAPs that will be emitted? If not, then please provide additional HAPs.

AMP-Ohio Response:

The only MACT standard proposed by USEPA for coal and oil fired electric generating units (EGUs) was issued in January 2004. *See* 69 Fed. Reg. 4652 (Proposed NESHAP; and, in the Alternative, Proposed Standards of Performance for New and Existing Stationary Sources: Electric Steam Generating Units, January 30, 2004). This EGU MACT proposal did not include standards for any non-mercury HAP. *See, also*, 65 Fed. Reg. 79825 (Regulatory Finding on the Emission of HAPs from EGUs, December 20, 2000).

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USEPA's position that mercury is the only HAP necessary to address for an EGU MACT determination is articulated, in detail, in the January 2004 proposed standard. *See, also*, USEPA's conclusions regarding CAA Section 112(n)(1)(A) in the January 2004 proposal. Thus, mercury is the only HAP that should be subject to a case-by-case MACT determination per CAA Section 112(g)(2)(B) and O.A.C. 3745-31-28(E)(4). Specifically, if a federal MACT standard has been proposed, case-by-case MACT requirements applied to the source shall have considered those emission limitations and requirements of the proposed MACT standard. However, AMP-Ohio also understands that the EGU MACT continues to be an unsettled issue due to litigation and court rulings.

AMP-Ohio did identify HAPs in addition to mercury in both its original May 2006 application and in the July 2008 112(g) supplemental analysis. Specifically, the Permit-to-Install (PTI) application submitted by AMP-Ohio in May 2006 included emission calculations for each HAP that could be emitted at an uncontrolled rate greater than 1.0 ton per year (TPY).¹ Despite the fact that mercury is the only HAP subject to a case-by-case analysis in concert per CAA 112(g)(2)(B) and O.A.C. 3745-31-28(E)(4), the 112(g) analysis submitted by AMP-Ohio in July 2008 also identifies a list of all HAPs that could be emitted an uncontrolled rate greater than 1.0 ton per year (p.7 Table 3-1).

Based on your request, Table 1 below identifies the HAPs listed in Section 1.1 of AP-42² with an estimated annual maximum uncontrolled emission rate equal to or greater than 0.01 TPY (10 pounds or more of uncontrolled emissions per year) per boiler that have not previously been identified in the PTI application or 112(g) materials submitted by AMP-Ohio.³ The actual controlled emission rates of each HAP will be significantly less than the uncontrolled rates identified in this table.

Table 1	
Estimated Uncontrolled Emission Rates for HAPs Identified in AP-42	
(Emitted at a Rate of Less than 1 TPY)	
HAP	Estimated Maximum Annual Uncontrolled Emissions (B001 and B002) (tpy)
Acrolein	0.40
Methylene chloride	0.40
Formaldehyde	0.33

¹ The instructions in the permit application direct the applicant to provide emission estimates for each HAP air pollutant that has potential emissions greater than 1 ton per year (TPY). These instructions are consistent with Ohio's air toxic law and regulation. R.C. 3704.03(F)(3)(c); O.A.C. 3745-114.

² AP-42 Section 1.1 Bituminous and Subbituminous Coal Combustion includes several tables with emission factors for HAPs (refer to tables 1.1-12, 1.1-13 and 1.1-14) Most of the emission factors for HAPs presented in this section of AP-42 have unreliable ratings of "D" and "E". Further, none of the emission factors are based on the use of a control system that is comparable to the system that will be employed at the AMPGS.

³ The maximum estimated annual uncontrolled emissions are per boiler.