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a t t o r n e y s a t l a w

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August 13, 2008

VIA UPS EXPRESS

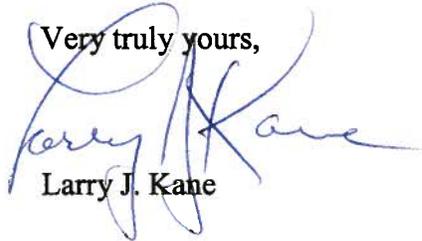
Regional Hearing Clerk (E-13J)
U.S. EPA, REGION 5
77 W. Jackson Boulevard
Chicago, IL 60604

Re: In the Matter of: Duke Energy Indiana, Inc.
Docket No. **CERCLA-05-2008-0009**
EPCRA-05-2008-0017
MM-05-2008-0004

Dear Clerk:

Enclosed please find an original and two copies of the **ANSWER AND REQUEST FOR ADMINISTRATIVE HEARING OF DUKE ENERGY INDIANA, INC.** for filing in the above-referenced dockets. Also enclosed please find an envelope with prepaid postage for your convenience in returning a file-stamped copy to us. Thank you for your courtesy and cooperation in this matter.

Very truly yours,



Larry J. Kane

Enclosure

cc: Julie L. Ezell (w/encl.)

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US EPA REGION V

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2008 AUG 14 PM 5: 51

BEFORE THE ADMINISTRATOR

In the Matter of)	Docket No.	CERCLA-05-2008-0009
)		MM-05-2008-0004
Duke Energy Indiana, Inc.)		EPCRA-05-2008-0017
1000 E. Main Street)		
Plainfield, Indiana)	Proceeding to Assess a Civil Penalty	
)	Under Section 109(b) of the	
Respondent.)	Comprehensive Environmental	
)	Response, Compensation, and Liability	
)	Act, and Section 325(b)(2), (c)(1) and	
)	(c)(2) of the Emergency Community	
)	Right-to-Know Act of 1986	

RESPONDENT'S ANSWER AND REQUEST FOR ADMINISTRATIVE HEARING

The Respondent, Duke Energy Indiana, Inc. ("Duke"), by counsel, states the following in Answer to the Administrative Complaint received by Duke on July 15, 2008 and issued to it by Linda M. Machowicz, Chief, Emergency Response Branch 2, Superfund Division, United States Environmental Protection Agency ("EPA"), Region 5 ("Complainant"). Duke also submits its Request for Administrative Hearing. Each allegation of the Complaint is restated herein prior to Respondent's corresponding answer.

I. ANSWER

1. This is an administrative proceeding to assess a civil penalty under Section 109(b) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. § 9609(b), and Section 325(b)(2), (c)(1), (c)(2) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11405(b)(2), (c)(1), (c)(2).

ANSWER: Duke ADMITS the allegations in Paragraph 1 of the Complaint.

2. The Complainant is, by lawful delegation, the Chief of the Emergency Response Branch 2, United States Environmental Protection Agency (U.S. EPA), Region 5.

ANSWER: Duke is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 2 of the Complaint.

3. The Respondent is Duke Energy Indiana, Inc., a corporation doing business in the State of Indiana.

ANSWER: Duke ADMITS the allegations in Paragraph 3 of the Complaint.

Statutory and Regulatory Background

4. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), requires any person in charge of a facility to immediately notify the National Response Center (NRC) as soon as that person has knowledge of any release of a hazardous substance from the facility in an amount equal to or greater than the hazardous substance's reportable quantity.

ANSWER: Complainant's allegations in Paragraph 4 of the Complaint involve a restatement of United States statutory law that does not require a response as the referenced statute speaks for itself.

5. Section 304(a)(1) of EPCRA, 42 U.S.C. § 11004(a)(1), requires the owner or operator of a facility to immediately provide notice, as described in Section 304(b) of EPCRA, 42 U.S.C. § 11004(b), if a release of an extremely hazardous substance in quantities equal to or greater than a reportable quantity occurs from a facility at which hazardous chemicals are produced, used, or stored and such release requires notice under Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

ANSWER: Complainant's allegations in Paragraph 5 of the Complaint involve a restatement of United States statutory law that does not require a response as the referenced statute speaks for itself.

6. Under Section 304(b) of EPCRA, 42 U.S.C. § 11004(b), notice required under 304(a) of EPCRA, 42 U.S.C. § 11004(a), must be given immediately after the release by the owner or operator of a facility to the community emergency coordinator for the local emergency planning committee (LEPC) for any area likely to be affected by the release and to the state emergency planning commission (SERC) of any state likely to be affected by the release.

ANSWER: Complainant's allegations in Paragraph 6 of the Complaint involve a restatement of United States statutory law that does not require a response as the referenced statute speaks for itself.

7. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), and Section 304 of EPCRA, 42 U.S.C. § 11004, provide a mechanism to alert federal, state, and local agencies that a response action may be necessary to prevent deaths or injuries to emergency responders, facility personnel and local community. A delay or failure to notify could seriously hamper the governments' response to an emergency and pose serious threats to human health and the environment.

ANSWER: Complainant's allegations in Paragraph 7 of the Complaint involve restatements of United States statutory law and characterizations of legislative intent that do not require a response as the referenced statutes speak for themselves.

General Allegations

8. Respondent is a “person” as that term is defined under Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

ANSWER: Duke ADMITS the allegation in Paragraph 8 of the Complaint.

9. Respondent is a “person” as that term is defined under Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

ANSWER: Duke ADMITS the allegation in Paragraph 9 of the Complaint.

10. At all times relevant to this Complaint, Respondent was an owner or operator, and person in charge of the Cayuga Generating Station, a facility located at 3300 North State Road 63 in Cayuga, Vermillion County, Indiana (facility).

ANSWER: Duke ADMITS the allegations in Paragraph 10 of the Complaint.

11. Respondent’s facility is a “facility” as that term is defined under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

ANSWER: Duke ADMITS the allegation in Paragraph 11 of the Complaint.

12. Respondent’s facility is a “facility” as that term is defined under Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

ANSWER: Duke ADMITS the allegation in Paragraph 12 of the Complaint.

13. The Chemical Abstract Service (CAS) number for chlorine is 7782-50-5.

ANSWER: Duke ADMITS the allegation in Paragraph 13 of the Complaint.

14. Chlorine is a “hazardous substance” as that term is defined under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

ANSWER: Duke ADMITS the allegation in Paragraph 14 of the Complaint.

15. Chlorine has a reportable quantity of 10 pounds, as indicated at 40 C.F.R. Part 302, Table 302.4.

ANSWER: Complainant's allegation in Paragraph 15 of the Complaint involves a restatement of a United States regulation that does not require a response as the referenced regulation speaks for itself.

16. Chlorine is a "hazardous chemical" within the meaning of Section 311(e) of EPCRA, 42 U.S.C. § 11021(e), and 29 C.F.R. § 1910.1200(c).

ANSWER: Duke ADMITS the allegations in Paragraph 16 of the Complaint.

17. At all times relevant to this Complaint, chlorine was produced, used or stored at the facility.

ANSWER: Duke ADMITS the allegation in Paragraph 17 of the Complaint.

18. Chlorine is an "extremely hazardous substance" according to Section 302(a)(2) of EPCRA, 42 U.S.C. § 11002(a)(2).

ANSWER: Duke ADMITS the allegation in Paragraph 18 of the Complaint.

19. Chlorine has a reportable quantity of 10 pounds, as indicated at 40 C.F.R. Part 355, Appendix A.

ANSWER: Complainant's allegation in Paragraph 19 of the Complaint involves a restatement of a United States regulation that does not require a response as the referenced regulation speaks for itself.

20. On June 14, 2005, at or about 5:25 a.m. Eastern Standard Time, Respondent discovered a release of chlorine from Respondent's facility.

ANSWER: Duke ADMITS the allegation in Paragraph 20 of the Complaint.

21. On June 14, 2005, at or about 6:15 a.m. Eastern Standard Time, Respondent knew that at least 10 pounds of chlorine had been released.

ANSWER: Duke DENIES the allegations in Paragraph 21 of the Complaint.

22. During the release, approximately 190 pounds of chlorine leaked, was emitted, discharged, or escaped into the air outside the facility within a 24-hour time period.

ANSWER: Duke DENIES the allegations in Paragraph 22 of the Complaint.

23. The release is a “release” as that term is defined under Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

ANSWER: Duke ADMITS the allegation in Paragraph 23 of the Complaint.

24. The release is a “release” as that term is defined under Section 329(8) of EPCRA, 42 U.S.C. § 11049(8).

ANSWER: Duke ADMITS the allegation in Paragraph 24 of the Complaint.

25. The release was one for which notice was required under Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

ANSWER: Duke ADMITS the allegation in Paragraph 25 of the Complaint.

26. The release was likely to affect the State of Indiana.

ANSWER: To the extent that Paragraph 26 of the Complaint alleges that some amount of chlorine may have migrated beyond the boundaries of the Duke facility within the State of Indiana, Duke ADMITS the allegation in Paragraph 26 of the Complaint. To the extent that Paragraph 26 of the Complaint is intended to allege that an injury or adverse effect in the State of Indiana resulted from the migration of chlorine beyond the facility’s boundaries, Duke DENIES the allegation in Paragraph 26 of the Complaint.

27. At all times relevant to this Complaint, the Indiana State Emergency Response Commission was the SERC for Indiana under Section 301(a) of EPCRA, 42 U.S.C. § 11001(a).

ANSWER: Duke ADMITS the allegation in Paragraph 27 of the Complaint.

28. The release was likely to affect Vermillion County, Indiana.

ANSWER: To the extent that Paragraph 28 of the Complaint alleges that some amount of chlorine may have migrated beyond the boundaries of the Duke facility within Vermillion County, Indiana, Duke ADMITS the allegation in Paragraph 28 of the Complaint. To the extent that Paragraph 28 of the Complaint is intended to allege that an injury or adverse effect in Vermillion County, Indiana resulted from the migration of chlorine beyond the facility's boundaries, Duke DENIES the allegation in Paragraph 28 of the Complaint.

29. At all times relevant to this Complaint, the Vermillion County Local Emergency Planning Committee was the LEPC for Vermillion County under Section 301(c) of EPCRA, 42 U.S.C. § 11001(c).

ANSWER: Duke ADMITS the allegation in Paragraph 29 of the Complaint.

Count 1

30. Complainant incorporates paragraphs 1 through 29 of this Complaint as if set forth in this paragraph.

ANSWER: Duke incorporates herein by reference its responses to Paragraphs 1 through 29 of the Complaint as if set forth in its response to Paragraph 30 of the Complaint.

31. Respondent notified the NRC of the release on June 14, 2005, at 9:06 a.m. Eastern Standard Time.

ANSWER: Duke ADMITS the allegation in Paragraph 31 of the Complaint.

32. Respondent did not immediately notify the NRC as soon as Respondent had knowledge of the release of a reportable quantity of chlorine.

ANSWER: Duke DENIES the allegation in Paragraph 32 of the Complaint.

33. Respondent's failure to immediately notify the NRC of the release is a violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

ANSWER: Duke DENIES the allegation in Paragraph 33 of the Complaint.

Count 2

34. Complainant incorporates paragraphs 1 through 29 of this Complaint as if set forth in this paragraph.

ANSWER: Duke incorporates herein by reference its responses to Paragraphs 1 through 29 of the Complaint as if set forth in its response to Paragraph 34 of the Complaint.

35. Respondent notified the Indiana SERC of the release on June 14, 2005, at 8:45 a.m., Eastern Standard Time.

ANSWER: Duke ADMITS the allegation in Paragraph 35 of the Complaint.

36. Respondent did not immediately notify the SERC after Respondent had knowledge of the release of a reportable quantity of chlorine.

ANSWER: Duke DENIES the allegation in Paragraph 36 of the Complaint.

37. Respondent's failure to immediately notify the SERC of the release is a violation of Section 304(a) of EPCRA, 42 U.S.C. § 11004(a).

ANSWER: Duke DENIES the allegation in Paragraph 37 of the Complaint.

Count 3

38. Complainant incorporates paragraphs 1 through 29 of this Complaint as if set forth in this paragraph.

ANSWER: Duke incorporates herein by reference its responses to Paragraphs 1 through 29 of the Complaint as if set forth in its response to Paragraph 38 of the Complaint.

39. Respondent notified the Vermillion County LEPC of the release on June 14, 2005, at 8:30 a.m., Eastern Standard Time.

ANSWER: Duke ADMITS the allegation in Paragraph 39 of the Complaint.

40. Respondent did not immediately notify the LEPC after Respondent had knowledge of the release of a reportable quantity of chlorine.

ANSWER: Duke DENIES the allegation in Paragraph 40 of the Complaint.

41. Respondent's failure to immediately notify the LEPC of the release is a violation of Section 304(a) of EPCRA, 42 U.S.C. § 11004(a).

ANSWER: Duke DENIES the allegation of Paragraph 41 of the Complaint.

Proposed CERCLA Penalty

42. Section 109(b) of CERCLA, 42 U.S.C. § 9609(b), authorizes U.S. EPA to assess a civil penalty of up to \$25,000 per day of violation of CERCLA Section 103. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and its implementing regulations at 40 C.F.R. Part 19 increased the statutory maximum penalty to \$27,500 per day of violation that occurred from January 31, 1997 through March 15, 2004, and to \$32,500 per day of violation for violations that occurred after March 15, 2004.

ANSWER: Complainant's allegations in Paragraph 42 of the Complaint involve restatements of United States statutory law and administrative regulations that do not require a response since the referenced statute and regulations speak for themselves.

43. Section 109(a)(3) of CERCLA, 42 U.S.C. § 9609(a)(3), requires U.S. EPA to consider the nature, circumstances, extent and gravity of the violations, a violator's ability to pay, prior history of violations, degree of culpability, economic benefit or savings resulting from the violation, and any other matters that justice may require, when assessing an administrative penalty under Section 109(b) of CERCLA.

ANSWER: Complainant's allegations in Paragraph 43 of the Complaint involve a restatement of United States statutory law that does not require a response since the referenced statute speaks for itself.

44. Based upon an evaluation of the facts alleged in this Complaint and the factors in Section 109(a)(3) of CERCLA, Complainant proposes that the U.S. EPA assess a civil penalty against Respondent of \$28,340 for the CERCLA violation alleged in Count 1 of this Complaint.

ANSWER: Without knowledge as to the specific bases upon which Complainant calculated the proposed penalty presented in Paragraph 44 of the Complaint, Duke DENIES any penalty is warranted because Duke denies that a violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a) occurred, as indicated in Duke's responses to Paragraphs 31 through 33 (Count 1) of the Complaint.

45. Complainant calculated the CERCLA penalties by evaluating the facts and circumstances of this case with specific reference to the U.S. EPA's "Enforcement Response

Policy for Sections 304, 311, and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (dated September 30, 1999),” a copy of which is enclosed with this Complaint.

ANSWER: Duke is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 45 of the Complaint.

Proposed EPCRA Penalty

46. Section 325(b) of EPCRA, 42 U.S.C. Section 11045(b), authorizes U.S. EPA to assess a civil penalty of up to \$25,000 per day of violation of EPCRA Section 304. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and its implementing regulations at 40 C.F.R. Part 19 increased the statutory maximum penalty to \$27,500 per day of violation that occurred from January 31, 1997 through March 15, 2004, and to \$32,500 per day of violation for violations that occurred after March 15, 2004.

ANSWER: Complainant’s allegations in Paragraph 46 of the Complaint involve restatements of United States statutory law and administrative regulations that do not require a response since the referenced statute and regulations speak for themselves.

47. Based upon an evaluation of the facts alleged in this Complaint, and after considering the nature, circumstances, extent and gravity of the violations, the violator’s ability to pay, prior history of violations, degree of culpability, economic benefit or saving resulting from the violations, and any other matters that justice may require, Complainant proposes that the U.S. EPA assess a civil penalty against Respondent of \$56,680 for the

EPCRA violations alleged in this Complaint. Complainant allocated this proposed penalty to the various EPCRA counts of this Complaint as follows:

Count 2	EPCRA Section 304(a) (SERC):	\$28,340
Count 3	EPCRA Section 304(a) (LEPC):	\$28,340

ANSWER: Without knowledge as to the specific bases upon which Complainant calculated the proposed penalty presented in Paragraph 47 of the Complaint, Duke DENIES any penalty is warranted because Duke denies that violations of Section 304(a) of EPCRA, 42 U.S.C. § 11004(a) occurred, as indicated in Duke's responses to Paragraphs 35 through 37 (Count 2) and Paragraphs 39 through 41 (Count 3) of the Complaint.

48. Complainant calculated the EPCRA penalties by evaluating the facts and circumstances of this case with specific reference to U.S. EPA's "Enforcement Response Policy for Sections 304, 311, and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (dated September 30, 1999)," a copy of which is enclosed with this Complaint.

ANSWER: Duke is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 48 of the Complaint.

II. Statement of Circumstances and Arguments that
Constitute the Grounds of a Defense

1. Section 103(a) of CERCLA requires that notification be immediately given to the NRC of a release of a hazardous substance in a quantity equal to or greater than the RQ as soon as a person has knowledge of the release. Section 304(b) of EPCRA requires that notification be immediately given to the SERC and LEPC of releases that require notification under Section 103(a) of CERCLA. Duke notified the LEPC at the same time as it had obtained knowledge that chlorine had escaped from the facility in an amount likely to have exceeded the RQ, the SERC within 15 minutes after obtaining such knowledge, and the NRC within 36 minutes after obtaining such knowledge.

2. Neither CERCLA nor its implementing regulations define the term “immediate.” Given the inherent ambiguity in the meaning of this term and the lack of agency guidance, it would be arbitrary, capricious, and otherwise contrary to law for EPA to determine that the facts of the instant case do not meet the notification requirements of CERCLA.

3. Neither EPCRA nor its implementing regulations define the term “immediate.” Given the inherent ambiguity in the meaning of this term and the lack of agency guidance, it would be arbitrary, capricious, and otherwise contrary to law for EPA to determine that the facts of the instant case do not meet the notification requirements of EPCRA.

4. Duke’s notifications of the incident to the SERC and LEPC were “immediate” within the meaning of 42 U.S.C. § 11004. Duke had acquired knowledge at 8:30 a.m. on June 14, 2005 that an amount of chlorine equal to or greater than the RQ of 10 pounds was likely to have been released from the facility. Duke provided notice of the incident to the LEPC at

8:30 a.m. on June 14, 2005, at the same time Duke determined an amount of chlorine equal to or greater than the RQ was likely to have been released from the facility. Based on this, Duke provided notice to the LEPC “immediately” upon Duke’s discovery that the amount of chlorine released was likely to be greater than the RQ. Duke provided notice of the incident to the SERC at 8:45 a.m. on June 14, 2005, within 15 minutes of determining an amount of chlorine equal to or greater than the RQ was likely to have been released from the facility. Duke contends the notice provided to the SERC within 15 minutes of discovery of the release of an amount of chlorine likely to be greater than the RQ was “immediate”. Therefore, Duke is not liable for any civil penalties under 42 U.S.C § 11045(b), and is entitled to judgment in its favor.

5. Duke contends that its notification of the incident to the NRC was “immediate” within the meaning of 42 U.S.C. § 9602. Duke had acquired knowledge that an amount of chlorine equal to or greater than the RQ of 10 pounds was likely to have been released from the facility at 8:30 a.m. on June 14, 2005. In recognition of the more rapid emergency response capability of the LEPC and SERC, Duke prioritized its notification of the release to the LEPC and SERC before notifying the NRC, consistent with reasonable emergency response practices and procedures. As a result, Duke’s notice of the incident was provided to the NRC at 9:06 a.m. on June 14, 2005, within 36 minutes of determining an amount of chlorine equal to or greater than the RQ was likely to have been released from the facility. Based on this, Duke contends the notice provided to the NRC was “immediate”, having been given within 36 minutes of its discovery that the amount chlorine released was likely to have been greater than the RQ. Duke is therefore not liable for any civil penalties under 42 U.S.C. § 9609(b), and is entitled to judgment in its favor.

6. Duke also contends that, even if it is ultimately determined that a civil penalty is appropriate in this case, which Duke disputes, the amount of the penalty proposed in the Complaint herein is inappropriately high under EPA's civil penalty policy.

III. Statement of Facts that Respondent Intends to

Place at Issue in the Hearing

1. Duke will place at issue the fact that it did not obtain knowledge that a reportable quantity of chlorine was likely to have been released from the facility until 8:30 a.m. on June 14, 2005, not 6:15 a.m. on said date as alleged in Paragraph 20 of the Complaint. At 6:15 a.m. on June 14, 2005, Duke employees at the Cayuga Generating Station ("Station") shut off the valve of the chlorine cylinder to stop any further release. It was not known to Duke at this time that at least 10 pounds of chlorine were released from the chlorination system for the Station's intake water.

An investigation into the cause of the chlorine release was conducted and a hole was discovered in the tubing connecting the chlorine cylinder to the chlorination equipment room. During this investigation, it was discovered that a chlorine release alarm had been triggered in the chlorination equipment room at 12:58 a.m. on June 14, 2005. Station personnel conducted preliminary calculations to estimate the maximum amount of chlorine that could have been released from the cylinder between 12:58 a.m., when the chlorine detection system was triggered, and 6:15 a.m., when the chlorine release was terminated. It was not until 8:30 a.m. on June 14, 2005, that Station personnel completed these calculations and determined more than 10 pounds of chlorine was likely to have been released on June 14, 2005. Therefore, Duke did not have knowledge that greater than 10 pounds of chlorine was released until 8:30

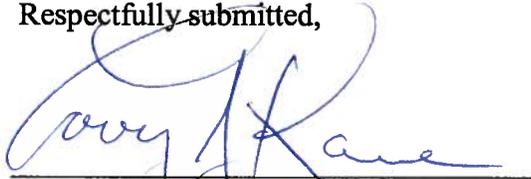
a.m. on June 14, 2005. Thus, notification to the LEPC occurred at essentially the same time that Duke obtained knowledge that an amount of chlorine equal to or greater than the RQ was likely to have been released from the facility, notification to the SERC occurred within approximately 15 minutes after Duke obtained such knowledge, and notification to the NRC occurred within approximately 36 minutes after Duke obtained such knowledge.

2. Duke will place at issue the fact that no more than 100 pounds of chlorine, not 190 pounds as alleged in Paragraph 22 of the Complaint, were released from the facility on June 14, 2005. Duke's preliminary estimate that 190 pounds of chlorine was released represents a worst-case estimate of the total amount of chlorine that could have been released from the chlorine cylinder on June 14, 2005 based on the diameter of the hole in the connection tubing and the expected pressure of the chlorine contained in the cylinder. Based on usage rates for the chlorine cylinder, Duke subsequently determined that the maximum amount of chlorine that could have been released on June 14, 2005 was actually 100 pounds. When full, the chlorine cylinder contained 2000 pounds of chlorine. According to Duke usage records, the cylinder was placed in service on June 9, 2005 and removed from service on June 27, 2005, or a total of 19 days in service. While in service, 100 pounds of chlorine were injected into the facility's chlorination system each day from the cylinder. Based on this, a total of 1900 pounds of chlorine was injected into the chlorination system from the chlorine cylinder. Therefore, no more than 100 pounds of chlorine could have been released during the June 14, 2005 incident.

IV. Request for Hearing

In accordance with the procedures specified in the Administrative Complaint as well as 40 C.F.R. Part 22, Duke respectfully requests an administrative hearing in this matter.

Respectfully submitted,



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Attorneys for Respondent
Duke Energy Indiana, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2008, a copy of the foregoing "Answer to Petitioner's Verified Petition for Review" was mailed by United States Mail, with first class postage affixed, to counsel as follows:

Timothy Thurlow (C-14J)
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U.S. EPA, Region 5
77 W. Jackson Boulevard
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