



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 01 2012

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/Development Section
Ohio Environmental Protection Agency, Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

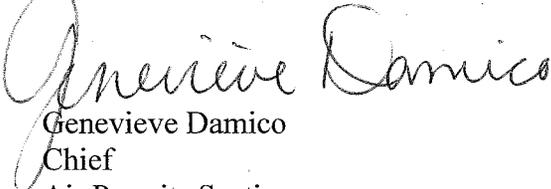
The U.S. Environmental Protection Agency has reviewed the draft renewal Title V Permit Number P0091217, for DP&L Killen Generating Station located in Manchester, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Condition C.1(b)(2)n on pages 26 and 27 states that, in light of uncertainties regarding the expected carbon monoxide (CO) emissions from coal-fired utility boilers, the permittee may petition the Director of Ohio EPA to change the Best Available Technology CO limits after completing initial testing and six months of continuous emissions monitoring. Please note that if the CO limit is to be changed, modifications to the Permit to Install and Title V permit must be made to reflect the change and these modifications must undergo public comment periods.
2. Condition C.2(b)(2)d on pages 55 and 56 states "U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012." Please omit this sentence as EPA believes it is outdated and not relevant.
3. Condition C.3(c)(5) on page 65 defines start-up as "the time necessary to bring a turbine on line from a no load condition to fully activated water injection and shall not exceed a maximum of 60 minutes." This term could allow the turbine to be operate in an extended start-up mode by keeping the water injection, an emissions control device, offline. Please clarify this term to indicate that the water injection will be fully activated as soon as the start-up process allows.
4. For the 7.77 tons-per-year nitrous oxides emission limit at units B002 and B003, the comment in the Comments column of the Statement of Basis is worded in a way that suggests that the limit does not apply at all. Please clarify that the limit

does apply until EPA approves the December 1, 2006 version of Ohio Administrative Code 3745-31-05 as part of the State Implementation Plan.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Kaushal Gupta, of my staff, at (312) 886-6803.

Sincerely,


Genevieve Damico
Chief
Air Permits Section