



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

REPLY TO THE ATTENTION OF:

JAN 06 2012

Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey,

On December 7, 2011, the U.S. Environmental Protection Agency received notification of the Indiana Department of Environmental Management's (IDEM) intent to issue a renewal title V permit for Duke Energy Indiana – Edwardsport Generating Station (Duke). Based on our review of the renewal title V permit and Technical Support Document we have the following comments. We provide these comments to help ensure that the title V renewal meets federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision.

The renewal permit reiterates the IDEM's justification for relying on EPA's 1997 particulate matter with a diameter of 10 microns or less (PM₁₀) Surrogate Policy to carry out the Best Available Control Technology (BACT) requirement for Duke's proposed particulate matter with a diameter of 2.5 microns or less PM_{2.5} emissions. The IDEM also recognized that, consistent with the EPA finding in the Order for Louisville Gas and Electric (LG&E) (at 45-46), one cannot proceed on a general presumption that PM₁₀ is always a reasonable surrogate for PM_{2.5}. Accordingly, IDEM provided additional language to support the IDEM's conclusion that the BACT determination for PM₁₀ was sufficient to meet the BACT requirements for PM_{2.5} as well. The PM₁₀ surrogacy demonstration provides sufficient technical basis to conclude that the BACT requirement for PM₁₀ (good combustion practices) would also satisfy the BACT requirement for PM_{2.5}. However, the permit record could be further improved. We recommend that you ensure that the permit record includes an adequate justification for the conclusion that add-on controls are not technically feasible and good combustion practices represent BACT for PM₁₀ and reiterating the top down BACT analysis for PM₁₀.

This comment letter does not address the use of PM₁₀ as a surrogate for PM_{2.5} for the air quality impact analysis because the title V renewal permit is based on a PM_{2.5} analysis.

Again, we appreciate the opportunity to provide comments on this draft permit. Please feel free to contact me or have your staff contact Charmagne Ackerman at (312) 886-0448.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section