



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

JUL 28 2016

REPLY TO THE ATTENTION OF

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

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft part 70 renewal permit for Indiana-Kentucky Electric Corporation Clifty Creek Station, permit number 077-36338-00001. To ensure that the source meets Federal 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 D.2.3 states that, “[I]n order to ensure compliance with [the particulate emission limitations of] Condition D.2.1, the baghouse for particulate control shall be in operation and control emissions from the associated coal processing points or drop conveyors at all times the associated coal processing points or drop point conveyors is in operation.” However, the emission unit description box for Section D.2 does not identify the baghouse(s) and where they are installed. Condition D.2.3 and the emission calculations of the technical support document (TSD) Appendix A imply that at least some coal processing points or drop conveyors are equipped with a baghouse. We request that you include additional descriptive information in the permit to clarify the number and locations of the baghouse(s).
- 2.) Condition E.2.2 lists the applicable provisions of 40 C.F.R. Part 60, Subpart OOO that apply to the Limestone Processing (LP) System. Condition E.2.2 appears to be missing several applicable provisions, as follows:

Applicable Provisions	Description / Justification
40 C.F.R. § 60.674(c),(d) and (e)	<p>Describes visible emissions monitoring requirements and alternative monitoring options for affected facilities for which construction, modification, or reconstruction commenced on or after April 22, 2008, that use a baghouse to control emissions.</p> <p>The permit record indicates the LP system was constructed on or after April 22, 2008, and that it is equipped with two storage silo bin vent filter dust collectors to control emissions.</p>
40 C.F.R. § 60.676(b)(1)	<p>Specifies that owners or operators of affected facilities (as defined in §§60.670 and 60.671) for which construction, modification, or reconstruction commenced on or after April 22, 2008, must record each periodic inspection required under §60.674(b) or (c).</p> <p>The permit record indicates the LP system was constructed on or after April 22, 2008, and it has applicable periodic inspection requirements in §60.674(b) or (c).</p>
40 C.F.R. § 60.676(k)	<p>Specifies general information of where to submit notifications and reports required under the Subpart.</p> <p>The permit indicates that the LP system is subject to reporting requirements (such as 40 C.F.R. § 60.676(g)).</p>
40 C.F.R. Part 60, Subpart OOO Table 2	<p>Describes stack emission limits and compliance demonstration requirements for affected facilities with capture systems.</p> <p>The permit cites § 60.672(f) as an applicable requirement, which states that a baghouse that controls emissions from only an individual, enclosed storage bin must meet applicable stack opacity limits and compliance requirements in Table 2. The stack opacity limit appears to be applicable to the LP system's two storage silo bin vent filter dust collectors.</p>

We request that you review the applicability of the above provisions, and update the permit, as appropriate.

- 3.) Condition E.4.2 lists the applicable provisions of 40 C.F.R. Part 63, Subpart ZZZZ that apply to the Clifty Quench Pump (CEQP-01). Condition E.4.2(3) cites 40 C.F.R. § 63.6590(a)(1)(ii) as an applicable requirement. However, it appears that the correct applicable requirement is 40 C.F.R. § 63.6590(a)(2)(ii), since CEQP-01 has a site rating of ≤ 500 brake horsepower, and commenced construction on or after June 12, 2006.

We request that you review the applicability of the above provisions, and update the permit, as appropriate.

- 4.) Condition E.4.2 lists the applicable provisions of 40 C.F.R. Part 63, Subpart ZZZZ that apply to the two propane-fired emergency engines, identified as Clifty Emergency Microwave Generator (CEMG-01) and Clifty Emergency Substation Generator (CESG-1). Condition E.4.2(3) cites 40 C.F.R. § 63.6590(a)(1)(ii) as an applicable requirement for both engines, which classifies both engines as "existing stationary RICE".

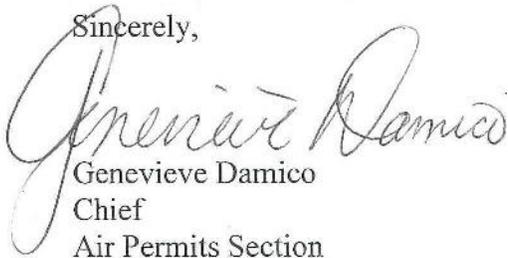
However, it appears that the correct applicable requirement for CESG-1 is 40 C.F.R. § 63.6590(a)(2)(ii), since CESG-1 has a site rating of ≤ 500 brake horsepower, and it commenced construction on or after June 12, 2006 (CESG-1 was installed in 2008). As such, CESG-1 would be considered a "new stationary RICE". It follows that CESG-1 may be considered a new emergency stationary RICE subject to 40 C.F.R. § 63.6590(c)(6), as well as the applicable requirements (if any) of 40 C.F.R. Part 60, Subpart JJJJ.

We request that you re-evaluate the applicability of the above provisions to CESG-1, and update the permit, as appropriate.

- 5.) On page 14 of the TSD, the Indiana Department of Environmental Management has determined that the requirements of the Cross State Air Pollution Rule (CSAPR) apply to the six wet-bottom pulverized coal-fired boilers, identified as units 1 through 6, but the requirements are not included in the permit. Both CSAPR and Federal Implementation Plan requirements are applicable requirements and, as such, must be included in the part 70 operating permit. We request that you add the CSAPR applicable requirements to the permit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Paymon Danesh, of my staff, at (312) 886-6219.

Sincerely,



Genevieve Damico
Chief
Air Permits Section