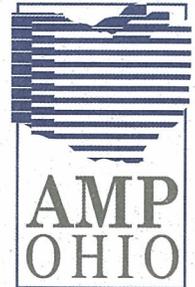


March 4, 2009

Via Electronic Mail and Overnight Delivery



American Municipal
Power-Ohio, Inc.

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**RE: American Municipal Power Generating Station
Response to Questions Regarding 112(g) MACT Analysis**

Dear Dean and Rod:

American Municipal Power-Ohio, Inc. (AMP-Ohio) has developed this letter to respond to Ohio EPA's February 19, 2009 request for additional information related to AMP-Ohio's July 2008 Clean Air Section 112(g) analysis for AMP-Ohio's proposed American Municipal Power Generating Station (AMPGS). This letter responds to each request as follows:

Ohio EPA Request for Additional Information 1:

First, please identify the source (or sources) that AMP evaluated as the "Best Controlled Similar Source" for each HAP category (Hg, Organic HAP, etc.) as stipulated by OAC Chapter 3745-31-28(E) and why that source or those sources were selected. Please identify any pilot projects and if not selected then an explanation as to why those should not be the "Best Controlled Similar Source". Please provide any supporting documentation relied upon in any such claim that has not been provided to date and if already provided please identify those documents.

AMP-Ohio Response:

Ohio EPA's request references the "best controlled similar source" phrase found at OAC rule 3745-31-28(E)(1). Specifically, this subsection states that the "...MACT emission limitation or MACT requirements recommended by the applicant and approved by the director shall not be less stringent than the emission control which is *achieved in practice* by the best controlled *similar source*...". (emphasis added).

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KENTUCKY: WILLIAMSTOWN



As a first step in the 112(g) analysis, AMP-Ohio evaluated whether or not a source similar to AMPGS exists; it does not. As explained in both AMP-Ohio's July 2008 submittal and February 6, 2009 letter, AMPGS is a unique facility due to its combination of boiler design and the overall air pollution control system that will be employed. AMPGS is the only electric generating unit (EGU) committed to utilize Powerspan ammonia-based wet-FGD control system in full operation at a commercial scale. In addition, no EGU currently in operation employs a comprehensive SCR, fabric filter baghouse, wet-FGD and wet-ESP control system.

Since no similar sources exist, AMP-Ohio next evaluated control systems at operating coal-fired EGU facilities. With respect to operating units, little to no reliable data exists. U.S. EPA's 112(g) Clearinghouse did not contain any entries for a coal-fired EGU (<http://www.epa.gov/ttn/atw/112g/112gmact/112gmact.html>). In addition, emission limits/control levels at operating facilities have not been demonstrated to a level of "achieved in practice" since testing data is limited to short-term emission test results that have variability (i.e. there is no on-going or long term data demonstrating what has been "achieved in practice").

Next, AMP-Ohio evaluated new coal-fired EGU facilities, currently in construction or post-permit design (i.e. not operating). AMP-Ohio evaluated a wide-range of permitted facilities. The dissimilar projects were eliminated first (i.e. different design technologies, size, coal blends, geographic factors). Then, AMP-Ohio more closely evaluated permitted projects utilizing similar blend of coals, designs and size. The permitted projects deemed the "closest matches" were used in AMP-Ohio's 112(g) analysis for all categories of HAPs. The projects include: MidAmerican Energy Company, Santee Cooper Cross, Longview, Thoroughbred, Prairie State, LG&E Trimble, Longleaf, AEP Turk (draft permit). Please note that several of the projects listed intend to utilize primarily sub-bituminous coal; thus, even those comparisons are limited by this important distinction.

Pilot projects were excluded from the 112(g) analysis/basis due to the fact that pilot projects go beyond the scope of the requirements of both 112(g) and OAC 3745-31-28(E). Specifically, pilot projects are designed as short-term, discreet evaluations of new, unproven technologies. For instance, pilot projects are performed pursuant to a set of defined, best-case conditions (utilization of specific fuels and limited operational ranges) As such, any results gleaned from a pilot project cannot be applied to a commercial-size unit or during standard operating conditions.

Ohio EPA Request for Additional Information 2:

Please provide AMP's proposed emission limitations in lbs/MW-hr for comparison purposes. I would also like AMP to provide Ohio EPA with the calculation sheets as previously requested.

AMP-Ohio Response:

While AMP-Ohio desires to work with Ohio EPA to provide data in forms most useful to the agency, the 112(g) emission limit for mercury proposed for AMPGS cannot be directly correlated to a lb/MW-hr figure due to the differences in gross, net and nominal figures. As such, we do not believe we can perform a calculation that would provide you with a real lb/MW-hr rate. Instead, we would request, consistent with other 112(g) analyses, that you compare our mercury analysis on lb/tBtu basis. That said, we do note that AMP-Ohio's proposed mercury figure is significantly less than the vacated NSPS for bituminous coal (40 CFR 60, Da) of 21 lb/MW-hr.

Ohio EPA for Additional Information 3:

Ohio EPA is aware that the Weston 4 project in Wisconsin has been installed and at one time activated carbon injection (ACI) was required by the air permit. Please provide Ohio EPA with an explanation regarding whether Weston has now demonstrated ACI in practice and what makes Weston 4 dissimilar to the AMP Project for the purposes of identifying the "Best Controlled Similar Source".

AMP-Ohio Response:

The Weston 4 project became operational in June 2008. While Weston 4 has performed some initial testing of its mercury control technologies, the mercury control testing was performed in conjunction with NETL as part of a national research project. As such, the technologies employed and the test results are both products of a defined, discreet research project, not long-term commercial scale operation. Thus, Weston 4 has not demonstrated the use of ACI results as a best control "achieved in practice" as required by OAC 3745-31-28(E)(1).

In addition, Weston 4 is not similar to AMPGS. Specifically, Weston 4 uses Powder River Basin sub-bituminous coal and is equipped with a dry-scrubber FGD system. As you know, the boilers at AMPGS are designed to accommodate the use of both eastern and western fuel blends. In addition, the overall air pollution control system that will be installed at the AMPGS includes a SCR, a fabric filter baghouse, wet-FGD control system and a wet-ESP. This system is significantly different from the system employed at Weston 4. AMP-Ohio believes the differences in fuels and differences in the air pollution control systems demonstrate that the AMPGS is not similar to Weston 4.

Ohio EPA for Additional Information 4:

Please provide detailed clarification including supporting documentation for the following statement from your February 6, 2009, response to comment 5: "However, as you know, this technology has not yet been deployed at a facility the size of AMPGS, so it is impossible to establish hard data regarding emission reductions."

Mr. Dean Ponchak and Mr. Rod Windle
March 4, 2009
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AMP-Ohio Response

The Powerspan ammonia-based wet-FGD control system has been demonstrated on an approximate 50 MW slipstream at the FirstEnergy Burger Generating Station. This is the largest and only operation of the Powerspan wet-FGD control system to date. Thus, the Powerspan system has not been installed or operated on any boiler that approaches the size of the boilers at the AMPGS. Therefore, any operational data gleaned from the testing at FirstEnergy's installation cannot be correlated with a high degree of certainty to a project the size of AMPGS. While AMP-Ohio finds the test information helpful and informative, it cannot serve as the sole basis for a 112(g) analysis.

Thank you for providing AMP-Ohio the opportunity to respond to your requests for additional information. Please do not hesitate to contact me if you have any further questions.

Sincerely,



Randy Meyer
Director of Environmental Affairs

cc: Bob Hodanbosi
Mike Hopkins
Scott Kiesewetter