



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: November 15, 2005
RE: Indiana Michigan Power / 147-21930I-00020
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 1/10/05



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Mr. John LaGrange
Plant Environmental Coordinator
Indiana Michigan Power Company
2791 North US Highway 231
Rockport, IN 47635

November 15, 2005

Re: Interim Minor Source Modification Petition
147-21930I-00020

Dear Mr. LaGrange:

On October 28, 2005, the Office of Air Quality (OAQ) received an interim petition from Indiana Michigan Power Company, 2791 North US Highway 231, Rockport, IN 47635. Based on the data and information submitted in the interim petition and the provisions in 326 IAC 2-13-1, this interim petition to construct is hereby approved for the following:

- (a) Addition of material handling equipment to support the testing of various sorbents (at 500 tons per year) for the removal of mercury from flue gas either at the 650 MW scale in a single electrostatic precipitator (ESP) on Unit 2 of the Rockport Plant, or at a pilot scale through an approximately 5,000 acfm effluent gas stream and a baghouse installed downstream of the ESP.
- (b) Addition of injection ports and urea handling equipment to support a short term test of urea for additional NO_x removal.

Detailed conditions will be specified in the final minor source modification **147-21930-00020**. This interim minor source modification expires on the effective date of the final minor source modification. This interim minor source modification may be revoked after its effective date upon a written finding by the OAQ that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final minor source modification is denied. The facilities subject to this approval may not operate until the final minor source modification is issued by OAQ.

If you have any questions on this matter, please contact Ms. Iryn Calilung of my staff at (317) 233-5692.

Sincerely,

Original signed by
Paul Dubenetzky
Assistant Commissioner
Office of Air Quality

cc: File -- Spencer County
Spencer County Health Department
Air Compliance Section - - DFH
SRWO
Mr. D. J. Long
AEP, One Riverside Plaza, Columbus, OH 43215

**Indiana Department of Environmental Management
Office of Air Quality**

Interim Minor Source Modification Evaluation

Company Name:	Indiana Michigan Power Company - Rockport Plant
Location:	2791 North US Highway 231, Rockport, IN 47635
Permit No:	147-21930I-00020
Permit Reviewer:	Iryn Calilung 317-233-5692
Date Receipt of Application:	October 26, 2005
Description of the interim construction:	
(a)	Addition of material handling equipment to support the testing of various sorbents (at 500 tons per year) for the removal of mercury from flue gas either at the 650 MW scale in a single electrostatic precipitator (ESP) on Unit 2 of the Rockport Plant, or at a pilot scale through an approximately 5,000 acfm effluent gas stream and a baghouse installed downstream of the ESP.
(b)	Addition of injection ports and urea handling equipment to support a short term test of urea for additional NOx removal.

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
 - (1) construction of a PSD source or PSD modification;
 - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
 - (3) any modification subject to 326 IAC 2-4.1.
- (c) Approve or deny the interim significant source modification, in writing within 19 calendar days, or it becomes the enforceable interim significant permit revision or significant source modification. [326 IAC 2-13-1(d)]
- (d) Approve or deny the interim minor source modification, in writing within 19 calendar days of receipt of the petition.

Instructions: Check (✓) appropriate answers and make a recommendation.

1. Did the applicant submit a written petition for an interim minor source modification?
 Yes Go to question 2.
 No Ignore verbal request.

2. Did the applicant pay the \$500 interim permit fee?
 Yes Go to question 3.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

3. Did the applicant state acceptance of federal enforceability of an interim minor permit revision or minor source modification?
 Yes Go to question 4.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?
 Yes Go to question 5.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).5.
5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim minor permit revision or minor source modification is issued), including, but not limited to:
(a) Financial risk,
(b) Risk that additional emission controls may be required,
(c) Risk that the final registration may be denied.
 Yes Go to question 6.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).
6. Did the applicant begin construction prior to submitting the interim minor permit revision or minor source modification application?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
 No Go to question 7.

7. What is the type of the interim construction?
 New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
 Modification to an existing source Go to question 8.

The testing of various sorbents is expected to occur in 2006.

8. Did the applicant present data in the interim minor permit revision or minor source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
 Yes Go to question 9.
 No Deny the application pursuant to:
326 IAC 2-13-1(c)(2)(B), for PSD ;
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;
326 IAC 2-13-1(c)(2)(C), for state rules.

Particulate potential to emit of the material handling has been determined.

Net emission increases haven been determined using the methodology: Projected actual to past actual. Indiana Michigan Power Company determined that this addition of the material handling and the testing on Unit 2 will be a minor PSD modification.

9. Is the proposed modification to be located in a nonattainment area?
 Yes Go to question 10.
 No Go to question 11. County: Spencer County

Spencer County is nonattainment for PM2.5.

10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?

Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
 No Go to question 11.

Net emission increases of PM and PM10 emissions were determined by Indiana Michigan Power Company to be less than the PSD significant levels for PM and PM10, based on the methodology Projected actual minus Past Actual.

11. Did the petition include a complete description of the process?

Yes Go to question 12.
 No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2)(B).

12. Did the interim minor permit revision or minor source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.

Yes Go to question 13.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

13. Do the emission controls and/or throughput limits prevent PSD applicability?

Yes Go to question 14.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

Activated carbon is limited to 500 tons per year.

14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?

Yes Go to question 15.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?

Yes Go to question 16.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?

Yes Go to question 17.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

17. Does the applicant dispute applicability of any applicable state or federal rule?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim minor permit revision or minor source modification petition?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).
 No Go to question 19.
19. Is there a good reason to believe that information in the petition has been falsified?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).
 No Approve the interim minor source modification petition.

Comments: A copy of the interim petition is available in the Spencer County Public Library.

October 25, 2005

IDEM Cashier
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

Dear Sir or Madam:

Enclosed please find a check for \$500.00 and three copies of a Petition for Interim Approval to Construct a Minor Modification at Indiana Michigan Power Company, dba American Electric Power, Rockport Plant. The nature of this Minor Modification is to allow the installation of support equipment necessary to conduct the testing of various mercury removal sorbents during the upcoming Unit 2 outage. The actual testing of the sorbents is scheduled for 2006.

We anticipate filing the full Title V Minor Modification request for this project later this week. If you have any questions on the technical content of this application, please contact D. J. Long at the AEPSC Office in Columbus, Ohio at 614-716-1245.

Sincerely,



Patrick C. Hale
Plant Manager

enclosures

cc: P. A. Dal Porto/D. J. Long – Columbus
J. F. LaGrange
M. E. Summy



AIR PERMIT APPLICATION COVER SHEET
 State Form 50639 (R/2-04)
 INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM - Office of Air Quality - Permits Branch
 100 N. Senate Avenue
 P.O. Box 6015
 Indianapolis, IN 46206-6015
 Telephone: (317) 233-0178 or
 Toll Free: 1-800-451-6027 x30178 (within Indiana)
 Facsimile Number: (317) 232-6749
 Http://www.IN.gov/idem/air/permits/index.html



NOTES:

- The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.
- Submit the completed air permit application packet, including all forms and attachments and the appropriate filing fee (if applicable), to the **IDEM Cashier** and the local agency (if applicable).
- Detailed **instructions** for this form are available online at <http://www.IN.gov/idem/air/permits/apps/instructions/coverinstructions.pdf>.

FOR OFFICE USE ONLY	
PERMIT NUMBER:	<i>Interim</i>
	<i>147-219301-00020</i>
DATE APPLICATION WAS RECEIVED:	
RECEIVED	
OCT 26 2005	
State of Indiana Department of Environmental Management	

1. Tax ID Number: 35-0410455

PART A: Purpose Of Application

Part A is intended to identify the purpose of this air permit application. For the purposes of this form, the term "source" refers to the plant site as a whole and NOT to individual emissions units.

2. Source Name: Indiana Michigan Power Company – Rockport Plant	3. Source ID: 147 - 00020	
4. Billing Address: 2791 North US Route 231		
City: Rockport	State: IN	ZIP Code: 47635
5. Permit Level: <input type="checkbox"/> Exemption <input type="checkbox"/> Registration <input type="checkbox"/> SSOA <input type="checkbox"/> PBR <input type="checkbox"/> MSOP <input type="checkbox"/> FESOP <input checked="" type="checkbox"/> TVOP <input type="checkbox"/> Acid Rain		
6. Permit Type: <input type="checkbox"/> Initial <input type="checkbox"/> Renewal <input type="checkbox"/> Combination <input type="checkbox"/> Closure <input type="checkbox"/> Withdrawal <input type="checkbox"/> Relocation		
<input type="checkbox"/> Notice Only Change <input type="checkbox"/> Administrative Amendment <input type="checkbox"/> Modification / Revision <input type="checkbox"/> Review Request		
<input checked="" type="checkbox"/> Interim Approval <input type="checkbox"/> Transition (between permit levels) <input type="checkbox"/> General Permit (if available)		
<input type="checkbox"/> PSD <input type="checkbox"/> Emission Offset <input type="checkbox"/> MACT Preconstruction Review <input type="checkbox"/> Emission Reduction Credit Registry		
7. Is this an application for an initial construction and/or operating permit for a "greenfield" source?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8. Is this an application for construction of a new emissions unit at an existing source?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

PART B: Confidential Business Information

Part B is intended to identify permit applications that require special care to ensure that confidential business information is kept separate from the public file. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in the Indiana Administrative Code (IAC). To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

9. Is any of the information contained within this application being claimed as confidential business information?
 Yes No

PART C: Certification Of Truth, Accuracy, And Completeness

Part C is intended to be the official certification that the information contained within the air permit application packet is truthful, accurate, and complete. Any air permit application packet that we receive without a signed certification will be deemed incomplete and may result in denial of the permit.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Patrick C. Hale	Plant Manager
Name (typed)	Title
<i>Patrick C. Hale</i>	October 25, 2005
Signature	Date

RCVD OCT 26 '05

**Indiana Department of Environmental Management
Office of Air Quality**

Interim Petition Checklist

Instructions: (a) Please answer yes or no.
(b) Enclose this checklist with the completed interim petition package.

Company Name: Indiana Michigan Power Company, dba American Electric Power

Location: Rockport Plant

yes	1.	Is the written interim petition prepared?
yes	2.	Is the written petition signed and dated?
NA	3.	Is the public notice drafted?
yes	4.	Is the \$500 filing and review fee enclosed?
yes	5.	Is the account number written on the check or money order?
yes	6.	Is the Affidavit of Construction signed, dated, and notarized?
yes	7.	Is the proposed modification/revision described in detail?
yes	8.	Is the proposed modification/revision a modification or addition to an existing source?
no	9.	Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
yes	10.	Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
See note at right	11.	Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision? – PM2.5 – no significant increase in PM2.5 or its precursors is anticipated from this test program
yes	12.	Are potential emissions calculated?
yes	13.	Is federal enforceability consent specifically indicated?
NA	14.	Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
NA	15.	Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
NA	16.	Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
yes	17.	Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
no	18.	Has a regular modification/revision permit application been submitted to OAQ?
yes	19.	Is a regular modification/revision permit application going to be submitted to OAQ? If yes, indicate approximate date of submission: October 27, 2005
no	20.	Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
NA	21.	The interim petition comment period has been decided to be: 14 calendar days

Additional Comments:

This is a petition for an Interim Minor Modification approval to accommodate the installation to test ports for use in testing of various Mercury removal schemes using activated carbon injection.



**GSD-01 GENERAL SOURCE DATA—
BASIC SOURCE LEVEL INFORMATION**

State Form 50640 (R3 / 9-04)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM - Office of Air Quality - Permits Branch
100 N. Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
Http://www.IN.gov/idem/air/permits/index.html

NOTES:

- The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD-01 is a required form.

- Detailed instructions for this form are available online at <http://www.IN.gov/idem/air/permits/apps/instructions/gsd01instructions.pdf>.

- All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly, will result in your information becoming a public record, available for public inspection.

FOR OFFICE USE ONLY
PERMIT NUMBER:
147-21930I-00020

PART A: SOURCE LOCATION INFORMATION		
1. Source Name: <i>Indiana Michigan Power Company - Rockport Plant</i>		
2. Portable/Stationary: Is this a portable or stationary source?		<input type="checkbox"/> Portable <input type="checkbox"/> Stationary
3. Location Address: <i>2791 on US 231</i>		
City: <i>Rockport</i>	State: <i>In.</i>	ZIP Code: <i>47635</i>
4. County Name:		5. Township Name:
6. Geographic Coordinates:		
Latitude:		Longitude:
7. Universal Transferal Mercadum Coordinates (if known):		
Zone:	Horizontal:	Vertical:
8. Adjacent States: Is the source located within 50 miles of an adjacent state?		
<input type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Adjacent State(s): <input type="checkbox"/> Illinois (IL) <input type="checkbox"/> Michigan (MI) <input type="checkbox"/> Ohio (OH) <input type="checkbox"/> Kentucky (KY)		
9. Attainment Area Designation: Is the source located within a non-attainment area for any of the criteria air pollutants?		
<input type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Non-attainment Pollutant(s): <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> NOx <input type="checkbox"/> O3 <input type="checkbox"/> PM/PM10 <input type="checkbox"/> SO2		

PART B: SOURCE STATUS		
10. Source Name History: Has this source recently been operated under any other name(s)?		
<input type="checkbox"/> No <input type="checkbox"/> Yes - Past Source Name:		
11. Source Location History: Has the location of this source recently changed?		
<input type="checkbox"/> No <input type="checkbox"/> Yes - Past Location Address:		
City:	State:	ZIP Code:
County Name:	Township Name:	
12. Permitting Level: Has a permitting level been established for this source? <input type="checkbox"/> No <input type="checkbox"/> Yes – Indicate level below:		
<input type="checkbox"/> Registration <input type="checkbox"/> SSOA <input type="checkbox"/> Permit by Rule <input type="checkbox"/> MSOP <input type="checkbox"/> FESOP <input type="checkbox"/> TVOP <input type="checkbox"/> Exemption		
13. Existing Approvals: Have any exemptions, registrations, or permits been issued to this source?		
<input type="checkbox"/> No <input type="checkbox"/> Yes – List these permits and their corresponding emissions units in Part I, Existing Approvals.		
14. Unpermitted Emissions Units: Does this source have any unpermitted emissions units?		
<input type="checkbox"/> No <input type="checkbox"/> Yes – List all unpermitted emissions units in Part J, Unpermitted Emissions Units.		
15. New Source Review: Is this source proposing to construct or modify any emissions units?		
<input type="checkbox"/> No <input type="checkbox"/> Yes – List all proposed new construction in Part K, New or Modified Emissions Units.		
16. Risk Management Plan: Has this source submitted a Risk Management Plan?		
<input type="checkbox"/> Not Required <input type="checkbox"/> No <input type="checkbox"/> Yes, Date submitted: ___/___/___ EPA Facility Identifier: _____		

PART C: SOURCE CONTACT INFORMATION

17. Name of Source Contact Person : <i>David J. Long</i>		
18. Title (optional):		
19. Mailing Address: <i>1 Riverside Plaza</i>		
City: <i>Columbus</i>	State: <i>Ohio</i>	ZIP Code: <i>43215</i>
20. Internet Address (optional):		
21. Electronic Mail Address (optional):		
22. Telephone Number ((xxx) xxx-xxxx): <i>614-716-1245</i>	23. Facsimile Number (optional):	

PART D: AUTHORIZED INDIVIDUAL/RESPONSIBLE OFFICIAL INFORMATION

24. Name of Authorized Individual or Responsible Official: <i>Patrick Hale</i>		
25. Title: <i>Plant Manager</i>		
26. Mailing Address: <i>2791 N. U.S. 231</i>		
City: <i>Rockport</i>	State: <i>In.</i>	ZIP Code: <i>47635</i>
27. Telephone Number ((xxx) xxx-xxxx): <i>812-649-9171</i>	28. Facsimile Number (optional):	

PART E: OWNER INFORMATION

29. Name of Owner:		
30. Name of Owner Contact Person:		
31. Mailing Address:		
City:	State:	ZIP Code:
32. Telephone Number ((xxx) xxx-xxxx):	33. Facsimile Number (optional):	
34. Operator: Does the "Owner" company also operate the source to which this application applies?		
<input type="checkbox"/> No - Proceed to Part F below.	<input type="checkbox"/> Yes - Enter "SAME AS OWNER" on line 35 and proceed to Part G below.	

PART F: OPERATOR INFORMATION

35. Name of Operator:		
36. Name of Operator Contact Person:		
37. Mailing Address:		
City:	State:	ZIP Code:
38. Telephone Number ((xxx) xxx-xxxx):	39. Facsimile Number (optional):	

PART G: AGENT INFORMATION

40. Name of Agent: <i>N/A per ms. Long</i>		
41. Name of Agent Contact Person:		
42. Mailing Address:		
City:	State:	ZIP Code:
43. Electronic Mail Address (optional):		
44. Telephone Number ((xxx) xxx-xxxx):	45. Facsimile Number (optional):	
46. Request for Follow-up: Does the "Agent" wish to receive a copy of the preliminary findings during the public notice period (if applicable) and a copy of the final determination?		
		<input type="checkbox"/> No <input type="checkbox"/> Yes

PART H: SOURCE PROCESS DESCRIPTION

47. Process Description		48. Products	49. SIC Code	50. NAICS Code
a.			4911	
b.				
c.				
d.				

PART I: EXISTING APPROVALS

51. Permit ID	52. Emissions Unit ID	53. Expiration Date
a.		
b.		
c.		
d.		

PART J: UNPERMITTED EMISSIONS UNITS

54. Emissions Unit ID	55. Type of Emissions Unit	56. Actual Dates		
		Began Construction	Completed Construction	Began Operation
a.				
b.				
c.				
d.				
e.				

PART K: NEW OR MODIFIED EMISSIONS UNITS

57. Emissions Unit ID	58. New	59. Mod.	60. Type of Emissions Unit	61. Estimated Dates		
				Began Construction	Completed Construction	Began Operation
a.	<input type="checkbox"/>	<input type="checkbox"/>				
b.	<input type="checkbox"/>	<input type="checkbox"/>				
c.	<input type="checkbox"/>	<input type="checkbox"/>				
d.	<input type="checkbox"/>	<input type="checkbox"/>				
e.	<input type="checkbox"/>	<input type="checkbox"/>				

PART L: LOCAL LIBRARY INFORMATION

62. Date application packet was filed with the local library:

63. Name of Library: *Spencer County Public Library*

64. Name of Librarian (optional):

65. Mailing Address: *210 Walnut Street*

City: *Rockport* State: *In.* ZIP Code: *47635*

66. Internet Address (optional):

67. Electronic Mail Address (optional):

68. Telephone Number: 69. Facsimile Number (optional):

Page 1 of 2

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

PETITION FOR INTERIM MINOR SOURCE MODIFICATION

Source Name: **Indiana Michigan Power Company, dba American Electric Power - Rockport Plant**
Source Address: **2791 North US Highway 231, Rockport, IN 47635**
Mailing Address: **c/o Manager – Air Quality Services, American Electric Power Service Corporation, 1 Riverside Plaza, Columbus, OH 43215**
SIC Code: **4911**

Description of The Operation or Equipment:

Addition of material handling equipment to support the testing of various sorbents for the removal of Mercury from flue gas at either the 650 MW scale in a single electrostatic precipitator (ESP) on Unit 2 of the Rockport Plant, or at a pilot scale through an approximately 5000 acfm effluent gas side stream and bag house installed down stream of the electrostatic precipitator. Addition of injection ports and urea handling equipment to support a short term test of urea injection for additional NOx removal. This portion of the work is exempt from permitting under 326 IAC 2-1.1-3(h)(3).

Potential To Emit:

Based on USDOE Research, it is expected that there will be some increase in particulate emissions over the uninjected case during the 650 MW scale testing. The side stream testing is expected to cause no increase in emissions over the uncontrolled case and will extend some period of time beyond the 650 MW scale testing during 2006. However, this previous research indicates that we would expect an operating emissions increase of no more than 0.02 lb/MMBtu based on the ESP design at Rockport, we would expect to see less than a doubling since we are only injecting half of the ESP capacity on the unit. Due to the variability of the test results of the ESP since 2000, we have selected an increase of 0.02 lb/MMBtu to be added to the current ESP test value on file (0.016 lb/MMBtu) to represent the particulate emission increase during the test. The increase is modeled as applying to all hours of operation during the period January to March 2005, even though the 650 MW scale testing, to which this increase is attributable, will not be performed continuously during this period. The estimated emission rates will meet the NSPS emission limit for this unit of 0.1 lb/MMBtu. The estimated emissions are shown on the attached Table 1 used for determining the applicability of PSD, which are not triggered by this project. Estimated emissions from the new pneumatic materials handling equipment being installed to support the two carbon injection programs is 0.04 tons per year, as calculated on the attached Sheet 1.

PSD Requirements:

The attached Table 1 indicates that the annualized average of the highest 24 months of emissions during the period October 2000 through September 2005 occurred during the period September 2002 to August 2004 creating a PM baseline of 1711.3 tons per year. The peak 12 month period including the planned test of the 650 MW scale injection into the ESP is anticipated to be 1043.7 tons, which is below the baseline calculated. Therefore, PSD does not apply.

Sheet 1. Calculation of fugitive emissions from sorbent handling.

EMISSION ESTIMATES FOR MATERIAL HANDLING

From AP-42

$$E = k (0.0032) \frac{\left(\frac{U}{S}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}}$$

WHERE $k = 0.35$ for PM₁₀

$U = 1.3$ m/sec

$M = 5\%$

$$E = (0.35)(0.0032) \frac{\left(\frac{1.3}{5}\right)^{1.3}}{\left(\frac{5}{2}\right)^{1.4}} = 0.000054 \text{ lb/Ton}$$

For 500 Tons Total Throughput = (500) (0.000054 lb/tons) = 0.027 lb uncontrolled

Table 1. PSD Nonapplicability determination data.

	2006 Jan	F	M	A	M	J	J	A	S	O	N	D
Projected Heat Input	8806	7957	8806		2302	8307	8261	8401	8437	8806	8523	8806
Estimated Emission Rate	0.036	0.036	0.036		0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016
Rolling 12 Month Tons	158.51	143.23	158.51		18.42	66.46	66.09	67.21	67.50	70.45	68.18	70.45
	865.44	950.89	1036.18		1014.08	1015.80	1013.55	1019.76	1023.24	1023.22	1023.194	1023.17
	2005 Jan	F	M	A	M	J	J	A	S	O	N	D
Fuel Burn/Projected Heat Input	485280	413027	518109	431101	340140	458363	474491	419210	438178	8809	8526	8809
BTU	8678	8742	8833	8790	8831	8855	8975	9094	9131			
Emission Rate	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016	0.016
Tons PM	67.380157	57.77091	73.22331	60.63004	48.06042	64.94087	68.13691	60.9967318	64.01605	70.47	68.21	70.47
Rolling 12 Mo Emissions	920.96074	941.312	1014.535	962.1783	970.4644	864.3666	754.2964	751.793931	758.5671	771.82028	773.4575	774.3074
	2004 Jan	F	M	A	M	J	J	A	S	O	N	D
Fuel Burn	398043	93169	0	288689	103298	438246	457232	446926	400681	400692	467649	487823
BTU	8893	9128	0	8895	8751	8870	8858	8880	8929	8925	8897	8920
Emission Rate	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.016	0.016	0.016	0.016
Tons PM	155.75104	37.41965	0	112.9871	39.77428	171.0386	178.2071	63.4992461	57.24289	57.218818	66.57077	69.6221
Rolling 12 Mo Emissions	2049.2199	1907.692	1733.56	1690.457	1551.848	1555.457	1565.488	1450.21747	1332.559	1221.9414	1107.811	1009.332
	2003 Jan	F	M	A	M	J	J	A	S	O	N	D
Fuel Burn	470363	454820	447129	401983	457631	431823	428544	457540	454808	432480	462899	427683
BTU	9044	8942	8851	8825	8859	8812	8919	8880	8740	8820	8872	8933
Emission Rate	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044	0.044
Tons PM	187.17437	178.948	174.1317	156.09	178.3827	167.4299	168.1761	178.770029	174.901	167.83684	180.701	168.1017
Rolling 12 Mo Emissions	1081.2461	1260.194	1403.81	1506.911	1633.492	1751.298	1857.065	1972.34016	2085.905	2098.0198	2098.82	2080.643
	2002 Jan	F	M	A	M	J	J	A	S	O	N	D
Fuel Burn	397817	0	232687	403493	394867	377049	475494	482286	462092	396099	454901	467905
BTU	8750	0	8743	8755	8746	8774	8750	8777	8849	8935	8988	9048
Emission Rate	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.044	0.044
Tons PM	52.213481	0	30.51574	52.98872	51.8026	49.62342	62.40859	63.4953633	61.33578	155.72236	179.9006	186.2786
Rolling 12 Mo Emissions	654.83188	596.8944	559.2573	550.193	563.2668	559.706	563.3468	567.335759	582.5376	691.0779	819.8339	946.2853
	2001 Jan	F	M	A	M	J	J	A	S	O	N	D
Fuel Burn	440287	435064	507543	463826	290397	397669	441697	451833	349977	363554	388519	455254
BTU	8808	8878	8952	8919	8891	8916	8870	8780	8788	8652	8776	8761
Emission Rate	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015
Tons PM	58.170718	57.93747	68.15287	62.05296	38.7288	53.18425	58.76779	59.5064061	46.13397	47.182038	51.14464	59.8272
Rolling 12 Mo Emissions								693.275872	688.8037	672.23455	661.2126	660.7891
	2000 Jan	F	M	A	M	J	J	A	S	O	N	D
Fuel Burn	490654	481828	197453	209887	467506	427891	293131	455366	378817	476573	466874	456652
BTU	8856	8804	8903	8864	8811	8857	8974	8918	8906	8918	8877	8796
Emission Rate									0.015	0.015	0.015	0.015
Tons PM									50.60616	63.75117	62.16661	60.25066

Affidavit of Construction

I, Patrick C. Hale, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in Daviess County, Kentucky and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of Plant Manager for Indiana Michigan Power Company.
(Title) (Company Name)
3. By virtue of my position with Indiana Michigan Power Company, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Indiana Michigan Power Company.
(Company Name)
4. I, the undersigned, have submitted an interim minor permit revision petition to the Office of Air Quality for the construction of Mercury Sorbent Testing Equipment on Rockport Unit 2.
5. Indiana Michigan Power Company recognizes the following risks:
(Company Name)
(a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and
(d) any additional air permitting requirements.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature: Patrick C. Hale

Printed Name: Patrick C. Hale

Phone No.: 812-649-9171

Date: October 25, 2005

STATE OF INDIANA)

)SS

COUNTY OF Spencer)

Subscribed and sworn to me, a notary public in and for Spencer County and

State of Indiana on this 25th day of October, 20 05.

My Commission expires: 10-02-09

Signature: Alicia K. Saucerman

Printed Name: Alicia K. Saucerman

