INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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: January 10, 2007

RE: Louisville Gas and Electric Company / 061-24047-00023

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 of 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
FN-REGIS.dot 03/23/06

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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January 10, 2007

Dave Harmeling, Senior Engineer
Louisville Gas and Electric Company
500 LG&E Road
Muldraugh, Kentucky 40202

Re: 061-24047-00023
Second Revision to Registered
Construction & Operation Status,
CP 061-9890-00023

Dear Dave Harmeling:

The application of a revision request from Louisville Gas and Electric Company, received on December 08, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the operation of the following compressor engines and generators, to be located at 11955 Kintner Bottom Road in LaConia, Indiana, is classified as registered:

(a) One (1) 135 BHP, 4-stroke rich burn, natural gas fired reciprocating compressor engine with a rated capacity of 1.36 MMBTU per hour exhausting to the atmosphere.

(b) One (1) 33 BHP, 4-stroke rich burn, natural gas fired compressor engine with a rated capacity of 0.33 MMBTU per hour exhausting to the atmosphere.

(c) One (1) 9.7 KW, gasoline fired generator engine with a rated capacity of 0.2 MMBTU per hour exhausting to the atmosphere.

(d) One (1) 44.8 KW, natural gas fired generator engine with a rated capacity of 0.51 MMBTU per hour exhausting to the atmosphere.

(e) One (1) 44.8 KW, natural gas fired back-up generator engine (for emergency use only) with a rated capacity of 0.51 MMBTU per hour exhausting to the atmosphere.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

This revised registration is the second air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permit Branch
Office of Air Quality

KSR/EVP

cc: File - Harrison County
Harrison County Health Department
Air Compliance
Technical Support and Modeling
Compliance Data Section
Administrative and Development

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) or 326 IAC 2-5.5-4(a)(3)

Company Name:	**Louisville Gas and Electric Company**
Address:	**11955 Kintner Bottom Road**
City:	**Laconia, Indiana 47135**
Authorized individual:	**Barry Walker**
Phone #:	**(502) 627 – 3038**
Registration #:	**061-24047-00023**

I hereby certify that Louisville Gas and Electric Company is still in operation and is in compliance with the requirements of Registration 061-24047-00023.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration Revision

Source Background and Description

Source Name:	**Louisville Gas and Electric Company**
Source Location:	**11955 Kintner Bottom Road, LaConia, Indiana**
County:	**Harrison**
SIC Code:	**4922**
Construction Permit No.:	**061-9890-00023**
Permit Revision No.:	**061-24047-00023**
Permit Reviewer:	**Surya Ramaswamy/EVP**

The Office of Air Quality (OAQ) has reviewed an application from Louisville Gas and Electric Company relating to the addition of one (1) natural gas fired generator and one (1) back-up generator.

History

Louisville Gas and Electric Company was issued a registration for one (1) natural gas fired compressor on December 21, 1999.

This application is the second revision since the registration was issued on December 21, 1999. In addition to the above request for adding two (2) new units, the source has also requested to remove one (1) natural gas fired generator engine which was never constructed.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) 135 BHP, 4-stroke rich burn, natural gas fired reciprocating compressor engine with a rated capacity of 1.36 MMBTU per hour exhausting to the atmosphere.

(b) One (1) 33 BHP, 4-stroke rich burn, natural gas fired compressor engine with a rated capacity of 0.33 MMBTU per hour exhausting to the atmosphere.

(c) One (1) 9.7 KW, gasoline fired generator engine with a rated capacity of 0.2 MMBTU per hour exhausting to the atmosphere.

New Emission Units and Pollution Control Equipment

The source proposed to add the following units:

(a) One (1) 44.8 KW, natural gas fired generator engine with a rated capacity of 0.51 MMBTU per hour exhausting to the atmosphere.

(b) One (1) 44.8 KW, natural gas fired back-up generator engine (for emergency use only) with a rated capacity of 0.51 MMBTU per hour exhausting to the atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Emission Units Removed from the Source

The following emission units have been removed from the source.

(a) One (1) 16 KW, natural gas fired generator engine with a rated capacity of 0.24 MMBTU per hour exhausting to the atmosphere.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Construction and Operation Permit No.061-9890-00023 issued on December 21, 1999; and

(b) Registration Revision Permit No. 061-23310-00023 issued on January 09, 2006.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 08, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 to 2).

Potential to Emit of the Source After Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, inclulding air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Emission Unit	PM (tpy)	PM10 (tpy)	SO2 (tpy)	VOC (tpy)	CO (tpy)	NOx (tpy)	Single HAP (tpy)	Combined HAPs (tpy)
Existing Emission Units	0.15	0.14	0.07	2.45	73.35	17.36	0.41 (Ethane)	0.75
New Emission Units	0.023	0.022	0.001	0.07	8.784	5.219	Negligible	Negligible
Total	**0.173**	**0.162**	**0.071**	**2.52**	**82.134**	**22.579**	**0.51 (Ethane)**	**0.89**

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of CO is less than one hundred (100) tons per year, and the potential to emit (as defined in 2-1.1-1(16)) of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is registered and subject to the provisions of 326 IAC 2-5.1-2.

Justification for the Revision

This application is a Registration Revision request because it is not a Notice-Only change per 326 IAC 2-5.5-6(d) and, therefore, it is reviewed pursuant to 326 IAC 2-5.5-6(g).

This revision application is being processed pursuant to 326 IAC 2-5.5-6(h). Following this Registration Revision, 061-24047-00023, the potential to emit PM, SO_2, VOC, and NOx remains less than twenty five (25) tons per year, and potential to emit CO remains less than one hundred (100) tons per year. Therefore, the source is still subject to the provisions of 326 IAC 2-5.5.

County Attainment Status

The source is located in Harrison County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Harrison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) Harrison County has been classified as unclassifiable for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(d) Harrison County has been classified as attainment or unclassifiable in Indiana for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.17
PM-10	0.16
SO_2	0.07
VOC	2.52
CO	82.13
NO_x	22.58
Single HAP	0.51 (Ethane)
Combination HAPs	0.89

(a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

(b) These emissions are based on the emission calculations performed for the Registration Revision No. 061-24047-000023.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit CP 061-23310-00023, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this review.

(b) The requirements of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants (NESHAPs): Reciprocating Internal Combustion Engines) and 326 IAC 20 are not included in this permit because the insignificant reciprocating engines are not located at a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).

(c) The requirements of 40 CFR Part 63, Subpart YYYY (National Emission Standards for Hazardous Pollutants (NESHAPs): Stationary Combustion Turbines) and 326 IAC 20 are not included in the permit because the insignificant compressors are not located at a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).

(d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this review.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (New Source of Hazardous Air Pollutants)

The operation of these compressors and genrators will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (Volatile Organic Compounds)

None of the facilities located at this source have potential emissions greater than or equal to 25 tons per year. Therefore, no facility is subject to the requirements of 326 IAC 8-1-6.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

326 IAC 6-2 does not apply to the internal combustion engines at this source since these facilities are not used for purposes of indirect heating.

Proposed Changes

The following changes were made to the Registration 061-9890-00023.

The application of ~~the modification~~ **a revision** request from Louisville Gas and Electric Company, received on ~~November 28, 2005~~ **December 08, 2006**, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the operation of the following compressor engines and generators, to be located at 11955 Kintner Bottom Road in LaConia, Indiana, is classified as registered:

(a) One (1) 135 BHP, 4-stroke rich burn, natural gas fired reciprocating compressor engine with a rated capacity of 1.36 MMBTU per hour exhausting to the atmosphere.

(b) One (1) 33 BHP, 4-stroke rich burn, natural gas fired compressor engine with a rated capacity of 0.33 MMBTU per hour exhausting to the atmosphere.

(c) One (1) 9.7 KW, gasoline fired generator engine with a rated capacity of 0.2 MMBTU per hour exhausting to the atmosphere.

(d) One (1) ~~16 KW~~ **44.8 KW**, natural gas fired generator engine with a rated capacity of ~~0.24~~ **0.51** MMBTU per hour exhausting to the atmosphere.

(e) **One (1) 44.8 KW, natural gas fired back-up generator engine (for emergency use only) with a rated capacity of 0.51 MMBTU per hour exhausting to the atmosphere.**

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (**sixty (**60**)** readings~~) in a 6 hour period~~ as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**)** in a six (6) hour period.

This **revised** registration is ~~a revised registration~~ **the third air approval** issued to this source. The source may operate according to 326 IAC 2-5.5.

Conclusion

The Louisville gas and Electric Company operation shall be subject to the conditions of the attached Registration Revision No. 061-24047-00023.

Appendix A: Emissions Calculations
Generators
Company Name: Louisville Gas and Electric Company
Address City IN Zip: 11955 Kintner Bottom Road, LaConia, Indiana
Permit Number: 061-24047-00023
Plt ID: 061-00023
Reviewer: Surya Ramaswamy/EVP
Date: 12/22/2006

Emission Unit:
9.7 KW Gasoline Fired Generator
Generating Rating: 0.17 MMBtu/hr
Operating Hours: 8760 hours

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.1	0.084	1.63	3.03	62.7
Potential Emission in tons/year	0.07	0.07	0.06	1.20	2.23	46.14

	Pollutant			
	Benzene	Toluene	Formaldehyde	Propylene
Emission Factor in lb/MMBtu	2.58E-03	4.09E-04	1.18E-03	2.58E-03
Potential Emission in tons/year	0.00	0.00	0.00	0.00

44.8 Natural Gas Fired Generator
Generating Rating: 0.51 MMBtu/hr
Operating Hours: 8760 hours

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	9.50E-03	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emission in tons/year	0.02	0.02	0.00	4.94	0.07	8.31

	Pollutant			
	Benzene	Toluene	Formaldehyde	Propylene
Emission Factor in lb/MMBtu	2.58E-03	4.09E-04	1.18E-03	2.58E-03
Potential Emission in tons/year	0.01	0.00	0.00	0.01

44.8 Natural Gas Fired Back-up Generator (For Emergency Use Only)
Generating Rating: 0.51 MMBtu/hr
Operating Hours: 500 hours

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	9.50E-03	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emission in tons/year	0.00	0.00	0.00	0.28	0.00	0.47

	Pollutant			
	Benzene	Toluene	Formaldehyde	Propylene
Emission Factor in lb/MMBtu	2.58E-03	4.09E-04	1.18E-03	2.58E-03
Potential Emission in tons/year	0.00	0.00	0.00	0.00

Appendix A: Emissions Calculations
Compressors & Summary
Company Name: Louisville Gas and Electric Company
Address City IN Zip: 11955 Kintner Bottom Road, LaConia, Indiana
Permit Number: 061-24047-00023
Plt ID: 061-00023
Reviewer: Surya Ramaswamy/EVP
Date: 12/22/2006

135 BHP Natural Gas Compressor (4-Stroke Rich Burn)
Generating Rating: 1.34 MMBtu/hr
Operating Hours: 8760 hours

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	9.50E-03	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emission in tons/year	0.06	0.06	0.00	12.97	0.17	21.83

	Pollutant			
	Ethane	Methanol	Formaldehyde	Actaldehyde
Emission Factor in lb/MMBtu	7.04E-02	3.06E-02	2.05E-02	2.79E-03
Potential Emission in tons/year	0.41	0.18	0.12	0.02

33 BHP Natural Gas Compressor (4-Stroke Rich Burn)
Generating Rating: 0.33 MMBtu/hr
Operating Hours: 8760 hours

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	9.50E-03	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emission in tons/year	0.01	0.01	0.00	3.19	0.04	5.38

	Pollutant			
	Ethane	Methanol	Formaldehyde	Actaldehyde
Emission Factor in lb/MMBtu	7.04E-02	3.06E-02	2.05E-02	2.79E-03
Potential Emission in tons/year	0.10	0.04	0.03	0.00

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Total Potential Emission in tons/yr	0.17	0.17	0.07	22.58	2.52	82.13

	Pollutant		
	Ethane	Methanol	Formaldehyde
Total HAPS Emission in tons/yr	0.51	0.22	0.15

Methodology:

Emissions factors for 9.7KW Gasoline fired Generator are obtained from AP- 42 Table 3.3-1
Emissions factors for 44.8 KW Natural Gas Generator are obtained from AP- 42 Table 3.2-2
Emissions factors for 33 HP Natural Gas Compressor (4-Stroke Rich Burn) are obtained from AP- 42 Table 3.2-3
*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
The four highest organic and metal HAPs emission factors are provided above.

Potential Emission in tons/yr = $\frac{\text{lb}}{\text{MMBtu}} \times \frac{\text{MMBtu}}{\text{Hour}} \times \frac{\text{8670 hours}}{\text{Year}} \times \frac{\text{Tons}}{\text{2000 lb}}$