



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

AUG 22 2002

Mr. Allan Elliott
Department of Environmental Protection
Division for Air Quality
803 Schcnkel Lane
Frankfort, Kentucky 40601-1403

Dear Mr. Elliott:

In our February 14, 2002, letter we informed the Kentucky Division for Air Quality (KDAQ) that emissions from the proposed Thoroughbred Generating Station (TGS) in Muhlenberg County, Kentucky, would adversely impact visibility and potentially affect federally-listed threatened and endangered species at Mammoth Cave National Park. Our adverse impact finding was based on information provided by TGS and reflected in KDAQ's preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the TGS facility. The National Park Service Air Resources Division subsequently received a new modeling analysis from TGS. The revised analysis identified errors in meteorological data used in TGS's prior analyses, and suggests that there would be no adverse impacts on visibility at Mammoth Cave National Park. Our staff experts have talked to TGS's consultants, carefully reviewed this new information, and verified the validity of the results. Therefore, I hereby withdraw the previous adverse impact finding.

KDAQ's revised preliminary determination and draft PSD permit for the TGS facility now includes a 24-hour sulfur dioxide (SO₂) limit of 0.45 lbs/MMBtu, in addition to the 30-day rolling average limit of 0.167 lbs/MMBtu. We understand that TGS has agreed to a lower 24-hour SO₂ limit of 0.41 lbs/MMBtu in order to comply with short-term air quality standards and increments. We conducted an air quality modeling analysis of the 0.41 lbs/MMBtu limit and found potential adverse impacts on visibility at Mammoth Cave National Park at that level. We assessed alternative limits and found that at the 0.23 lbs/MMBtu level there would be no adverse impacts on visibility at Mammoth Cave National Park.

We would prefer that KDAQ lower the 24-hour SO₂ limit from 0.41 lbs/MMBtu to 0.23 lbs/MMBtu in the final TGS permit. However, we have reviewed data provided by TGS indicating that it would be very difficult to comply with the 30-day rolling average of 0.167 lbs/MMBtu if they actually operated at the 0.41 lbs/MMBtu rate, thereby subjecting them to enforcement action and penalties. In addition, based on operating data from other coal-fired power plants, we found that they could generally achieve short-term limits that were 25-35% higher than their 30-day rolling average rate. If TGS operates in a similar fashion it would actually emit in the range of 0.23 lbs/MMBtu over a 24-hour period.

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We understand TGS is willing to accept permit language that would lower the 24-hour limit based on actual operating data for the facility. In essence, based on two years of operating data, KDAQ would revise the 0.41 lbs/MMBtu permitted limit downward, with a target emission limit of 0.23 lbs/MMBtu or lower, consistent with plant operating experience and a reasonable margin to assure compliance. This good-faith commitment on the part of TGS further confirms our comfort level with the issuance of their permit.

Thank you for working with us to ensure park air quality resources are protected while enabling the proposed TGS project to move forward. If you have any questions regarding this matter, please contact Christine Shaver, Chief, National Park Service Air Resources Division, at (303) 969-2074.

Sincerely,

Assistant Secretary for
Fish and Wildlife and Parks

cc:

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