

Speedway Utilities Management, LLC
 2020 North Meridian Street
 Indianapolis, IN 46204

September 10, 2007

Ms. Felicia Robinson, Administrator
 City of Indianapolis - Office of Environmental Services
 2700 South Belmont Avenue
 Indianapolis, Indiana 46221



Ms. Nisha Sizemore, Chief
 Air Permits Branch
 IDEM Office of Air Quality
 100 North Senate Avenue (MC 61-53)
 Indianapolis, Indiana 46206

RE: Request for Construction Permit
 Speedway Utilities Management, LLC

Dear Ms. Robinson and Ms. Sizemore,

Speedway Utilities Management, LLC, a wholly owned subsidiary of Citizens Utilities Management, LLC, requests construction permit approval for the construction of a new central energy plant to serve retail steam customers in Speedway, Indiana in accordance with the provisions of 326 IAC 2-5.1-3. Given the contracts we anticipate with potential customers of the new system, Speedway Utilities Management plans to commence construction at the earliest opportunity following permit issuance and subsequent operation of the plant in September 2008.

The plant will consist of four (4) natural gas-fired boilers and auxiliary equipment (including but not limited to heat exchangers, deaerators, fans, pumps, motors, and boiler water treatment chemical storage), and one (1) stationary diesel emergency generator. The natural gas-fired boilers will be equipped with low NOx burners designed for NOx emissions at or below 30 parts per million.

We are aware that Central Indiana is currently designated as non-attainment for the 8-hour ozone and PM2.5 NAAQS, but that the U.S. EPA has proposed Indiana's petition to redesignate the area as attainment for the 8-hour ozone standard. However, potential emissions from the new stationary source are below the thresholds that would trigger major new source construction permit review under 326 IAC 2-3. The table below presents the potential emissions at design operating capacity of the new plant:

	PM	PM10	SO2	NOx	CO	VOC	Benzene	Formaldehyde	Hexane
<i>Tons per Year</i>	1.19	4.76	0.376	32.95	3.44	52.62	0.001	0.047	1.13

Actual emissions are anticipated to be significantly below those presented above given the demands of the customers anticipated to be served by this new facility. The enclosed permit application includes the required information to allow your staff to process the application and draft permit in accordance with the underlying rules.