

February 11, 2013

Mr. Henryk Olstowski
Designated Representative
Imperial Irrigation District
El Centro Generating Station
P.O. Box 937
Imperial, CA 92251

Re: Petition for Extension of the CEMS Certification Deadline for Units 3-1 and 3-2
at the El Centro Generating Station (Facility ID (ORISPL) 389)

Dear Mr. Olstowski:

The United States Environmental Protection Agency (EPA) has reviewed the July 2, 2012 petition submitted by the Imperial Irrigation District (IID) under §75.66, in which IID requested an extension of the deadline for completing continuous emission monitoring system (CEMS) certification testing at two new combined-cycle combustion turbines. EPA denies the petition, for the reasons given below.

Background

IID owns and operates the El Centro Generating Station, which is located in Imperial County, California. The El Centro facility includes two new combined-cycle natural gas-fired combustion turbines, known as Units 3-1 and 3-2. The two units are connected to a single steam turbine and are equipped with selective catalytic reduction (SCR) systems to control nitrogen oxides (NO_x) emissions.

Units 3-1 and 3-2 are subject to the Acid Rain Program. Therefore, El Centro is required to continuously monitor and report sulfur dioxide (SO₂), NO_x, and carbon dioxide (CO₂) emissions and heat input for these units in accordance with 40 CFR Part 75. To meet these monitoring requirements, El Centro has installed fuel flow meters and NO_x emission rate continuous emission monitoring systems (CEMS).

For new Acid Rain Program units, §75.4(b)(2) specifies the “compliance date” by which all required continuous monitoring systems must be certified. The compliance date is

180 calendar days after the unit commences commercial operation (as defined in 40 CFR 72.2). According to IID, Units 3-1 and 3-2 commenced commercial operation on March 1, 2012 and March 6, 2012, respectively. Therefore, the applicable compliance dates for Units 3-1 and 3-2 are, respectively, August 28, 2012 and September 3, 2012.

However, in the July 2, 2012 petition, IID states that on May 18, 2012, Unit 3-2 suffered a catastrophic failure and was returned to Sweden for inspection. In August 2012,¹ a replacement Unit 3-2 was shipped to El Centro and became available to commence its commissioning activities. IID had initially expected to certify the CEMS on Unit 3-1 in July 2012, but was forced to cease operation of Unit 3-1 until Unit 3-2 was replaced or until builder's risk insurance could be obtained to support operation of Unit 3-1 by itself.

In view of these unforeseen circumstances, IID requested that the deadline for initial certification be extended to December 28, 2012 for both units. According to IID, the extended deadline would be 180 days from the earliest expected restart date of Unit 3-1 after its steam turbine commissioning process, and approximately 120 to 150 days after the replacement Unit 3-2 was expected to commence commercial operation.

EPA's Determination

On August 3, 2012, EPA contacted Mr. Michael Taylor of IID regarding the operational status of Units 3-1 and 3-2. Mr. Taylor indicated that El Centro could not obtain builder's risk insurance for Unit 3-1; consequently, Unit 3-1 would continue to be shut down until the recommencement of commercial operation of Unit 3-2. According to Mr. Taylor, both units were expected to recommence commercial operation in September 2012. In a subsequent e-mail dated November 20, 2012, Mr. Karl Lany of SCEC (IID's environmental consulting firm) informed EPA that Units 3-1 and 3-2 were non-operational (still in forced outage) on their respective compliance dates, but that the units did operate for commissioning and testing in September 2012, as anticipated.

When a unit is in a forced outage on its compliance date, §75.4(d) provides the owner or operator with an additional window of time in which to certify the required monitoring systems, i.e., 90 operating days or 180 calendar days (whichever occurs first) after the unit recommences operation. Therefore, a petition for an extension of the original compliance date may not be needed.

On November 19, November 20, and December 13, 2012, IID provided information to EPA via e-mail, indicating that all required certification tests of the continuous monitoring systems had been successfully completed. The orifice-type fuel flow meters were found to

¹ See August 15, 2012 e-mail from Michael Taylor of El Centro to John Schakenbach of EPA.

meet the design criteria of American Gas Report No. 3 as well as ASME MFC-3M. The flow meters passed primary element inspections in November 2011, and in May 2012 the pressure, temperature, and delta-p transmitters met the accuracy specifications in section 2.1.6.1 of Part 75, Appendix D. Certification testing of the NO_x CEMS was completed on October 2, 2012.

Thus, the fuel flow meters were certified prior to the August 28 and September 3, 2012 compliance dates for Units 3-1 and 3-2, and the NO_x monitoring systems were certified well within the 90 operating day/180 calendar day window of time under §75.4(d). In view of this, EPA denies IID's petition to extend the compliance date for El Centro Units 3-1 and 3-2 to December 28, 2012; the requested extension is unnecessary.

Emissions Reporting Requirements for Units 3-1 and 3-2

In accordance with §75.64(a), when a unit is shut down on its compliance date and the owner or operator is unable to complete certification testing, quarterly emissions reports are not required until the unit recommences operation. Therefore, IID is required to submit quarterly electronic emissions reports for El Centro Units 3-1 and 3-2 starting with the third calendar quarter of 2012, when the units recommenced operation.

For all unit operating hours after the applicable compliance date (i.e., August 28, 2012 for Unit 3-1 and September 3, 2012 for Unit 3-2) until the date and hour at which the required NO_x CEMS certification tests were successfully completed,² IID shall report NO_x emission rate data for Units 3-1 and 3-2 in accordance with §75.4(d), using either the maximum potential NO_x emission rate (as defined in 40 CFR 72.2) or the conditional data validation provisions of §75.20(b)(3). Thereafter, IID shall report quality-assured NO_x emission rate data (or appropriate Part 75 substitute data values) for Units 3-1 and 3-2.

For SO₂ emissions, CO₂ emissions, and unit heat input rate, all of which depend on data from the fuel flow meters, IID shall report quality-assured fuel flow rate data (or appropriate Part 75 substitute data values during flow meter outages) for Units 3-1 and 3-2 starting with the first unit operating hour after the applicable compliance date. This is appropriate because the fuel flow meters were certified prior to the August 28 and September 3, 2012 compliance dates.

IID must submit all electronic quarterly reports using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool. The reports for the third and fourth quarters of 2012 shall be submitted within 30 days after the date of this letter. Prior to submitting these emissions reports, IID must use the ECMPS Client Tool to submit the results of the initial certification tests for Units 3-1 and 3-2.

² That is, October 2, 2012, hour 13 for Unit 3-1 and October 2, 2012, hour 12 for Unit 3-2.

EPA's determination relies on the accuracy and completeness of IID's July 2, 2012 petition and the subsequent e-mails dated August 15, November 19, November 20, and December 13, 2012 and is appealable under 40 CFR Part 78. If you have any questions regarding this determination, please contact John Schakenbach at (202) 343-9158. Thank you for your continued cooperation.

Sincerely,

/s/

Reid P. Harvey, Director
Clean Air Markets Division

cc: Deborah Jordan, EPA Region IX
Brad Poirez, ICAPCD
Art Diem, CAMD
John Schakenbach, CAMD
Craig Hillock, CAMD