



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 25 2002

OFFICE OF
AIR AND RADIATION

Max Greig
Alternative Designated Representative
Indeck-Pepperell Power Associates, Inc.
29 Mill Street
Pepperell, MA 01463

Re: Petition for alternative requirement for calculating CO₂ at Indeck Pepperell Unit
CC1

Dear Mr. Greig:

The United States Environmental Protection Agency (EPA) has reviewed the June 17, 2002 petition, submitted by Indeck-Pepperell Power Associates, Inc. (Indeck) under §75.66(a) for Unit CC1 at Indeck Pepperell Power Facility (Indeck Pepperell), Facility ID (ORISPL)10522. The petition requests approval to use Equation G-4, rather than Equation G-1, from Part 75, Appendix G for calculating and reporting carbon dioxide (CO₂) emissions for Unit CC1, beginning on April 1, 2002 or, alternatively, beginning on July 1, 2002. As discussed below, EPA approves Indeck's use of Equation G-4 starting July 1, 2002.

Background

Indeck Pepperell Unit CC1 is capable of firing both gas and oil. Prior to a recent rule change that became effective on July 12, 2002, oil-fired units were required under Part 75 to calculate CO₂ emissions using Equation G-1. Application of Equation G-1 requires periodic fuel sampling and analysis of the carbon content of the fuel and results in reporting CO₂ emissions in tons per day. 40 CFR part 75, appendix G, section 2.1. Under the recent rule change, oil-fired units have the option of using Equation G-4 instead, which does not require fuel sampling and analysis and results in reporting CO₂ emissions in tons per hour. See 67 FR 40394, 40475 (June 12, 2002). In its petition, Indeck requests to use Equation G-4, starting either second quarter (April 1, 2002) or third quarter 2002 (July 1, 2002), because that would avoid the need for fuel sampling and analysis.


EPA's Determination

EPA recognizes that the option to use Equation G-4 for an oil-fired unit reduces the regulatory burden for the owner or operator of the unit because periodic fuel sampling and analysis does not have to be conducted. However, in this case, Indeck does not explain why it should be allowed to use Equation G-4 for a full quarter before the effective date of the rule change. Presumably, since Indeck was required during second quarter 2002 to use Equation G-1, Indeck has already conducted any fuel sampling and analysis that was required for that quarter. Consequently, there seems to be no basis for exempting Indeck from Part 75 and lifting the fuel sampling and analysis requirement for that quarter.

With respect to Indeck's request to begin using Equation G-4 starting July 1, 2002, EPA notes that Part 75, as amended, allows Indeck to use Equation G-4 starting July 12, 2002, which is the effective date of the rule change. Allowing Indeck to use Equation G-4 several days earlier, i.e., starting July 1, 2002, will enable the company to report CO₂ emissions in tons per hour (instead of tons per day as calculated under Equation G-1) for the entire third quarter of 2002, rather than reporting CO₂ differently for different portions of the quarter. This will simplify the reporting of emissions for the unit, as well as facilitate EPA's electronic audit of the reported CO₂ emissions. Therefore, EPA grants Indeck's request to use Equation G-4, in lieu of Equation G-1, for Unit CC1 beginning July 1, 2002.

EPA's determination in this letter relies on the accuracy and completeness of Indeck's June 17, 2002 petition and is appealable under Part 78. If you have any questions regarding this correspondence, please contact Theresa Alexander at (202) 564-9747.

Sincerely,


Peter Tsigotis, Acting Director
Clean Air Markets Division

cc: Ian Cohen, Region 1
Sharon Weber, MADEP Lawrence
Tom Cusson, MADEP Central Region