

January 9, 2012

Mr. Charles W. Huguenard
Designated Representative
Senior Vice President and General Manager
Longview Power, LLC
966 Crafts Run Road
Maidsville, WV 26541

Re: Petition for Extension of CEMS Certification Deadline for Unit 001 at the Longview Power, Plant (Facility ID (ORISPL) 56671)

Dear Mr. Huguenard:

The United States Environmental Protection Agency (EPA) has reviewed the October 6, 2011 petition submitted by Longview Power LLC (Longview) under §75.66(a), in which Longview requested an extension of the deadline for completing continuous emission monitoring system (CEMS) certification testing at a new coal-fired boiler. EPA approves the petition in part, with conditions, as discussed below.

Background

Longview Power LLC owns and operates the Longview Power Plant, located in Maidsville, West Virginia. The facility includes a new 700 megawatt, coal-fired boiler known as Unit 001. According to Longview, Unit 001 is subject to the Acid Rain Program, the Clean Air Interstate Rule (CAIR) NO_x and SO₂ trading programs, and the Transport Rule (TR) NO_x and SO₂ trading programs. Therefore, Longview is required to continuously monitor and report sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon dioxide (CO₂) emissions and heat input from Unit 001 in accordance with 40 CFR Part 75. To meet these monitoring requirements, Longview has installed SO₂, NO_x, and CO₂ CEMS and a stack gas volumetric flow rate monitor.

For a new Acid Rain Program unit, §75.4(b)(2) specifies the “compliance date” by which the required CEMS must be certified. The compliance date is 180 calendar days after the unit commences commercial operation (as defined in 40 CFR 72.2). Under CAIR, however, the compliance date is the earlier of 90 unit operating days or 180 calendar days after the unit commences commercial operation (see 40 CFR 96.170(b), 96.270(b), and 96.370(b)).

According to Longview, Unit 001 commenced commercial operation on May 6, 2011. In an e-mail to EPA dated December 2, 2011, Longview stated that Unit 001 had 80 operating days in the 180 calendar day period following the commencement of commercial operation. Therefore, the applicable compliance date for Unit 001 is 180 calendar days after May 6, 2011, or November 2, 2011.

In its October 6, 2011 petition (and a subsequent e-mail dated December 7, 2011), Longview identified the following problems that Unit 001 experienced in 2011 after commencing commercial operation and indicated that, as of October 22, 2011, the unit had been offline for 98 calendar days due to these operational problems:

- From May 10-12, the unit was offline due to condensate feed water flow tube leaks and boiler tube leaks.
- From May 27-June 5, the unit was offline due to boiler tube leaks.
- From June 21-25, the unit was offline due to hydrogen seal leaks.
- From June 27- July 3, the unit was offline due to leaks in the hydrogen system, condenser tube leaks and boiler tube leaks.
- From July 16–August 5, the unit was offline due to damage to the induced draft fan caused by foaming overflow from the flue gas desulfurization absorber.
- From September 2–October 22, the unit was offline due to seven tube leaks discovered during a routine down time. Additional tubes were found to have subsurface cracks requiring repairs.

In the October 6, 2011 petition, Longview indicated that it might not be possible to complete the required CEMS certification testing by the November 2, 2011 deadline, due to the amount of time that would be required to complete repair, final tuning, and optimization of the boiler. Longview therefore requested an additional 720 unit operating hours in which to complete the required testing, in the event that the deadline could not be met.

EPA's Determination

On November 16, 2011 Longview sent an e-mail to EPA, confirming that the operational problems described above prevented Unit 001 from meeting the November 2, 2011 deadline for CEMS certification. The certification testing was finally completed one day late, on November 3, 2011.

In view of the circumstances that caused the CEMS certification testing at Longview Unit 001 to be delayed, EPA approves a one day extension of the certification deadline, i.e., to November 3, 2011. In the past, the Agency has granted similar test deadline extensions, for up to 720 unit operating hours when necessary. However, in this case, only one extra day beyond the November 2, 2011 deadline was required to complete the testing.

Conditions of Approval

Although EPA is approving an extension of the deadline for completing the CEMS certification testing at Unit 001, this does not relieve Longview of its responsibility under §75.64(a) to report emissions data for Unit 001 starting from the earlier of the relevant compliance date in §75.4(b) or the date on which certification testing is completed. In this case, since the compliance date in §75.4(b)(2) preceded the completion of certification testing by one calendar day, Longview must report SO₂ concentration, CO₂ concentration, NO_x emission rate, and flow rate data for each unit operating hour, starting with the first operating hour after November 2, 2011 and continuing through the hour in which the certification testing was successfully completed. During that time interval, Longview shall report the hourly gas concentration and flow rate data in accordance with §75.4(j), using either:

- (1) The maximum potential SO₂ concentration, the maximum potential CO₂ concentration, the maximum potential NO_x emission rate, and the maximum potential flow rate;
- (2) Reference methods under §75.22(b); or
- (3) Another procedure approved by the Administrator pursuant to a petition under §75.66.

EPA's determination relies on the accuracy and completeness of the information provided in Longview's October 6, 2011 petition and the subsequent e-mails dated November 16, December 2, and December 7, 2011 and is appealable under Part 78. If you have any questions regarding this correspondence, please contact Charles Frushour at (202) 343-9847. Thank you for your continued cooperation.

Sincerely,

/s/
Sam Napolitano, Director
Clean Air Markets Division

cc: Leonard Hotham, EPA Region III
Edward S. Andrews, West Virginia DEP
Charles Frushour (CAMD)