



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

SEP 24 2003

OFFICE OF
AIR AND RADIATION

Mr. Mark V. Carney
Designated Representative
Harquahala Generating Company, LLC
2530 N 491st Avenue
POB 727
Tonopah, AZ 85354

Re: Petition for Extension of CEMS Certification Deadline for Harquahala Generating Company (Facility ID (ORISPL) 55372), Unit 1

Dear Mr. Carney:

The United States Environmental Protection Agency (EPA) has reviewed the July 9, 2003 petition submitted by Harquahala Generating Company, LLC (HGC) under §75.66(a) in which HGC requested a 90-day extension of the deadline under §75.4(b) for certification of continuous emissions monitoring systems (CEMS) at Harquahala Unit 1. EPA denies the petition for a 90-day extension, but approves, with conditions, an alternative certification deadline, as discussed below.

Background

Unit 1 at the Harquahala Generating facility is a 353 MW combined-cycle combustion turbine, which is subject to the Acid Rain Program regulations. HGC is required to continuously monitor and report sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon dioxide (CO₂) emissions from Unit 1 in accordance with 40 CFR Part 75.

According to HGC, the unit commenced commercial operation, as defined in §72.2, on February 15, 2003. Under §75.4(b), the CEMS must be certified within 90 unit operating days or 180 calendar days, (whichever occurs first) after commencement of commercial operation of the unit. According to HGC, the 180 calendar days will elapse before the unit has accumulated 90 unit operating days. Therefore, the regulatory deadline for certifying the CEMS on Unit 1 is August 14, 2003.

In its July 9, 2003 petition, HGC states that the CEMS certification testing for Unit 1 has not yet been done and is not likely to be completed by the August 14, 2003 certification deadline. Therefore, HGC requested a 90-day extension of the deadline. To justify this request, HGC

described a number of problems that the unit has experienced since commencing commercial operation. These are:

- On March 20, 2003, Unit 1 was shutdown due to severe damage to the bearing surfaces in the gas turbine, caused by contamination in the bearing lubrication oil. As a result, the gas turbine could not be operated for 91 days until the appropriate repairs were completed.
- On May 8, 2003, while Unit 1 was under repair, Siemens Westinghouse, the manufacturer of the turbine, issued an urgent technical advisory (UTA) describing a mandatory modification to the unit, in order to correct for excessive vibration levels in the conductors in the collector-end parallel ring extension. A temporary solution to this problem was implemented to bring the unit back on line on June 19. The permanent solution was underway at the time the July 9, 2003 petition was drafted.
- On June 13, 2003, Siemens Westinghouse issued a UTA calling for the installation of additional vents, drains and temperature elements to the steam turbine casing to avoid damage from water induction during startup of the turbine. This UTA was in response to problems experienced with other similar Siemens Westinghouse turbines at other locations.

EPA's Determination

As discussed above, HGC Unit 1 experienced substantial damage to the bearings following the commencement of operation and two UTAs requiring modifications to the unit were issued by Siemens Westinghouse, in May and June, 2003. The damage to the bearings caused an extended unit outage and prevented the CEMS certification testing from being performed in a timely manner.

In its July 9, 2003 petition, HGC requested a 90 calendar day extension of the August 14, 2003 CEMS certification deadline. EPA denies this request, but agrees that an alternative deadline may be warranted, in view of the 91-day unit outage caused by the damaged bearings. Therefore, EPA approves an alternate certification deadline of 720 unit operating hours from the hour in which the unit recommenced operation on June 19, 2003. This alternative deadline is based on the fact that the unit has been operable since June 19, 2003.

EPA maintains that approval of the alternative certification deadline should be conditioned on HGC's reporting emissions for Unit 1 for the entire period for which reporting is required under Part 75, i.e., starting from the original certification deadline under § 75.4(b). Consequently, if certification testing has not been completed by August 14, 2003, HGC shall report substitute data for each operating hour, from the first hour after August 14, 2003 until the hour in which the CEMS are provisionally certified under § 75.20(a)(3). In order to ensure that

nitrogen oxide (NO_x) emissions are not under-reported in the period extending from August 14, 2003 until completion of the certification testing, HGC shall report, as substitute data for each hour in this period, the maximum potential emission rate for NO_x, in accordance with Part 75, Appendix A, section 2.1.2.1, paragraphs (a) (option 2), (b), and (c).

EPA's determination in this letter relies on the accuracy and completeness of HGC's July 9, 2003 petition and is appealable under part 78. If you have any questions regarding this correspondence, please contact Matthew Boze at (202) 564-1975.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Napolitano', with a long horizontal flourish extending to the right.

Samuel Napolitano, Acting Director
Clean Air Markets Division

cc: Steve Frey, Region 9
Kathy Houed, Maricopa Co.