

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY - 9 2001

Mr. Gary H. Thorn  
 Vice President  
 C H Resources, Inc.  
 110 Main St.  
 Poughkeepsie, NY 12601

Re: Petition to use a default moisture constant for petroleum coke at C H Resources, Inc.'s  
 Niagara Falls Facility

Dear Mr. Thorn,

The United States Environmental Protection Agency (EPA) has received your petition, dated September 22, 2000, under 40 CFR 75.66(a) for the C H Resources, Inc.'s (CH Resources) Niagara Falls Facility (Niagara Falls), ORIS Code 50202. The petition requests to use a default moisture value of 4.7 % for all hours of operation, rather than using a moisture continuous emission monitoring system (CEMS). As discussed below, EPA approves the petition with certain conditions.

Background

Niagara Falls is a circulating fluidized bed boiler serving a 50 MWe generator and combusts bituminous coal, petroleum coke, and lubricating oil. According to the petition, C H Resources installed and attempted to certify a moisture CEMS, but the CEMS has been unable to pass the required relative accuracy test audit (RATA). C H Resources states that this is because the magnitudes of oxygen measurements used to determine moisture are very low, making the moisture value "highly sensitive" to small calibration drifts of the CEMS.

C H Resources notes that 40 CFR 75.11(b)(1), 75.12(b), and 75.13(c) allow the use of fuel-specific default moisture values for certain fuels for calculating emissions of sulfur dioxide, nitrogen oxide, and carbon dioxide. The regulations do not provide a default value for petroleum coke or lubricating oil and so do not allow Niagra Falls to use the default moisture values in lieu of a moisture CEMS. Further, C H Resources provides 22 runs of moisture data collected at Niagra Falls using reference a method (40 CFR part 60, method 4), during the course of three separate testing exercises. According to CH Resources, the testing was conducted under a variety of boiler operating conditions and that the lowest moisture content value measured was 4.7%.

EPA's Determination

Because of C H Resources apparent inability to certify a moisture CEMS at Niagara Falls and since the regulations provide for default moisture values for one, but not all, of the fuel

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combusted at the unit, EPA agrees that a default moisture value may be used for the unit for any hour that the unit burns bituminous coal or petroleum coke. Further, C H Resources's approach based on 22 runs of data under a variety of boiler conditions results in a conservative default moisture value that will not result in understating emissions.

Consequently, EPA approves the petition to use a default moisture value of 4.7% for the calculation of sulfur dioxide mass emissions using Equation F-2 in 40 CFR part 75, appendix F, carbon dioxide mass emissions also using Equation F-2, and heat input using Equation F-18, consistent with the monitoring plan for Niagara Falls. This default value is applicable to each hour in which the unit burns bituminous coal or petroleum coke, starting with the first such hour for which the unit is required to report emissions under the Acid Rain Program. C H Resources must document the use of the default moisture value in record type 531 in the monitoring plan.

EPA's determination in this letter relies on the accuracy and completeness of the information in the September 22, 2000 petition and is appealable under 40 CFR part 78. If you have further questions about this matter, please contact Matthew Boze of my staff at (202) 564-1975 or at [boze.matthew@epamail.epa.gov](mailto:boze.matthew@epamail.epa.gov).

Sincerely,

*/s/*

Brian J. McLean  
Director, Clean Air Markets Division

cc: Ms. Ann Zownir - USEPA Region 2  
Mr. Dennis Sullivan - NYSDEC Central Office  
Mr. Henry Sandomato - NYSDEC Region 9 *2*  
*Matthew Boze - EMB*