



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

SEP 25 2002

OFFICE OF
AIR AND RADIATION

Richard D. Waggoner
Environmental, Health & Safety Manager -
Mirant Mid-Continent Alternate Designated Representative
4200 S. Hulen, Suite 527
Forth Worth, TX 76109

Re: Petition for extension for CEMS certification at Wrightsville Units G4 and G5

Dear Mr. Waggoner :

The United States Environmental Protection Agency (EPA) has reviewed the July 9, 2002 petition from Mirant Americas Development (Mirant) for its Wrightsville Power Facility (Wrightsville) (Facility ID (ORISPL) 55221) under §75.66(a) of the Acid Rain regulations. The petition requests extension of the deadline to complete certification of continuous emission monitors (CEMS) for nitrogen oxide (NO_x) for two new combustion turbines, Unit G4 and Unit G5, at Wrightsville. For the reasons discussed below, EPA approves the petition with conditions.

Background

Mirant is completing construction of the Wrightsville Power Facility. Under the requirements of §75.4 (b)(2) that were in effect at the time, certification of the CEMS for each combustion turbine at Wrightsville had to be completed within 90 days of the unit's commencement of commercial operation. Units G4 and G5 were each first synchronized to the grid and began producing electricity for sale on April 5, 2002. For each unit, the 90-day deadline for CEMS certification was July 4, 2002. The certification testing was actually completed on July 8, 2002 for Unit G4 and July 18, 2002 for Unit G5.

Mirant states that several technical difficulties prevented it from completing the testing on time. Specifically, since first synchronization to the grid, the operation of the units has not been at normal load. Rather, they have been operated at lower loads in order to complete performance tests, emission tests, assessment of expected power output, and debugging operations. In addition, maintenance and construction activities prevented frequent operation of the units, and problems associated with the sequential use of alibration gases required the rescheduling of the testing to

complete the certification process. Mirant therefore requests that the CEMS certification deadlines be extended to July 8 and 18, 2002 for Units G4 and G5 respectively.

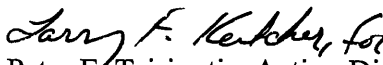
EPA's Determination

Mirant apparently experienced unavoidable, technical problems during the commissioning of the new units at Wrightsville. These problems prevented Mirant from meeting the CEMS certification deadlines for Units G4 and G5. Mirant appears to have taken reasonable measures to resolve these problems. Under these circumstances, EPA approves the requested extensions of the certification deadlines for Unit G 4 and G5.

However, EPA maintains that the extensions should be conditioned on Mirant reporting emissions for the entire period for which reporting is required under Part 75, i.e., starting from the original certification deadline for each unit. Consequently, Mirant shall report substitute data for Units G4 and G5 for each operating hour, from the first hour after 90 days from the respective unit's commencement of commercial operation until the hour for which that unit's NO_x CEMS are certified under §75.20(a). In order to ensure that emissions are not under-reported, Mirant shall use, as substitute data, the maximum potential emission rate for NO_x in accordance with Part 75, Appendix A, Section 2.1.2.1.

EPA's determination relies on the accuracy and completeness of the information in the July 22, 2002 petition and in the August 26, 2002 supplement submission and is appealable under Part 78 of the Acid Rain regulations. If you have any further questions about this matter, please contact Ruben Deza at (202) 564-3956.

Sincerely,


Peter E. Tsirigotis, Acting Director
Clean Air Markets Division

cc. Joseph Winkler, Region VI