

July 23, 2001

Mr. Daniel Ewan
Project Manager
Pine Bluff Energy, LLC
5301 Fairfield Road
Pine Bluff, Arkansas, 71601

Re: Petition for a 45-day extension to complete the CEMS certification test for a new unit at Pine Bluff Energy Center, ORIS Code 55075.

Dear Mr. Ewan:

The United States Environmental Protection Agency (EPA) has received your July 2nd, 2001 petition, under §75.66(a) of the Acid Rain regulations, for the Pine Bluff Energy Center, ORIS Code # 55075. The petition requests an extension of 45-days beyond the 90-day regulatory deadline to complete the certification process for a new unit. For the reasons discussed below, EPA approves the petition.

Background

The Pine Bluff Energy Center has is a dual fuel combined cycle turbine cogeneration plant in Pine Bluff Arkansas. The steam from the cogeneration facility will be used by an industrial host. The affected unit is a GE 7FA combustion turbine with a Nooter Eriksen heat recovery steam generator. The project also includes a General Electric steam turbine with a Cerrey auxiliary boiler.

Commercial operation, as defined in 40 CFR Part 75, Subpart A, Section 72.2., began on April 3rd, 2001 when the combustion turbine was first synchronized to the grid. Since then, the petition states that the project has undergone a number of delays due to several technical problems. Many of the delays listed relate to steam blowing activities in support of the industrial host.

For example, the petition states that the unit's steam was used to clean the steam piping to the project's steam turbine and over 1500 feet of high pressure steam piping to the industrial host. The petition further explains that these activities were delayed by approximately a week

and a half due to the availability of water from the industrial host. Also, steam blowing activities were further delayed by a number of equipment problems with the commissioning of both the combustion turbine and the auxiliary boiler. All piping restorations were not completed until early June. During the steam blowing activities, the petition alleges that the combustion turbine output was limited to 50% load or lower and was not commissioned on its secondary fuel source, distillate oil.

Further, the petition states that in early June, the commissioning of the steam turbine limited the ability to reach normal plant load. Problems with the steam turbine control system further delayed the commissioning by two weeks. The combustion turbine was run at base load for the first time on June 25, 2001. The operator performed a tuning of the machine, experiencing a number of problems with the combustion process. As a result it was necessary to disassemble part of the combustion process and ship it offsite for testing and repairs.

The petition indicated that the continuous emission monitoring system has been installed, calibrated and will be in service and ready for certification. It is expected that the combustion turbine will be running at base load and therefore, could complete the certification process in the next two to three weeks. For these reasons, an extension of 45 days to the certification deadline to complete the process has been requested.

EPA's Determination

As discussed above, the petitioner experienced a number of unavoidable technical problems during the start up of the new unit at the Pine Bluff Energy Center. These difficulties affected operation of the turbine and the company's ability to comply with current certification requirements. After careful review of the information provided by the company, and further clarifications from Mr. Daniel Ewan and Mr. Steve Coombe EPA agrees that the severity of the technical problems was major. Further, the company appears to have performed all reasonable measures to promptly resolve the issues.

The purposes of Part 75 include ensuring that each continuous emission monitoring system is certified in a timely manner to provide consistent, accurate emission data throughout the operations of the affected unit. However, as the unit was not able to complete operational and commissioning procedures due to technical difficulties, EPA approves the petition for an extension of the certification period for 45 days. EPA's determination relies on the accuracy and

completeness of the information in the July 2, 2001 petition 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,

/s/

Brian J. McLean, Director
Clean Air Markets Division

cc. Joseph Winkler, Region VI