

July 28, 2011

Ms. Kim Stoker,  
Environmental Manager  
City Public Service  
P.O. Box 1771  
Mail Drop 1000406  
San Antonio, TX 78296

Re: Petition for Extension of CEMS Certification Deadline for Units CGT5 and  
CGT6 at the V.H. Braunig Power Station (Facility ID (ORISPL) 3612)

Dear Ms. Stoker,

The United States Environmental Protection Agency (EPA) has reviewed the May 13, 2011 petition submitted by City Public Service Energy (CPS Energy) under 40 CFR 75.66. The petition requests an extension of the certification deadlines for the nitrogen oxides (NO<sub>x</sub>) continuous emission monitoring systems (CEMS) installed on Units CGT5 and CGT6 at the V.H. Braunig Power Station. EPA approves the petition, with conditions, as discussed below.

#### Background

CPS Energy owns and operates the V.H. Braunig Power Station (Braunig) located near San Antonio, Texas. On October 10, 2008, CPS Energy commenced construction of four new peaking combustion turbines, Units CGT5, CGT6, CGT7, and CGT8, at Braunig. According to CPS Energy, the units are subject to the Acid Rain Program. Therefore, CPS Energy is required to continuously monitor and report sulfur dioxide (SO<sub>2</sub>), NO<sub>x</sub>, and carbon dioxide (CO<sub>2</sub>) emissions and heat input for these units, in accordance with 40 CFR part 75.

Section 75.4(b) requires the owner or operator of a new Acid Rain Program unit to ensure that all required CEMS are installed and certified no later than 90 unit operating days or 180 calendar days (whichever comes first) after the date on which the unit commences commercial operation.<sup>1</sup> To meet the NO<sub>x</sub> emission rate (lb/mmBtu) monitoring requirements of Part 75, CPS Energy installed a Thermo Scientific Model 42i NO<sub>x</sub> analyzer and a Thermo Scientific Model

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<sup>1</sup> Note that on March 28, 2011, EPA published amendments to §75.4(b), changing the window of time allotted for CEMS certification to 180 calendar days after the unit commences commercial operation (see 76 FR 17288 (March 28, 2011)). Since this rule change was not in effect in 2010, it does not impact this petition response.

48i O<sub>2</sub> analyzer. To account for SO<sub>2</sub> and CO<sub>2</sub> mass emissions and unit heat input, CPS Energy uses the excepted methodologies in Appendices D and G of Part 75.

Units CGT5 and CGT6 commenced commercial operation on April 22, 2010 and April 28, 2010, respectively. Therefore, the NO<sub>x</sub> and O<sub>2</sub> CEMS were required to be certified by the earlier of 90 unit operating days or 180 calendar days following those dates. The 180<sup>th</sup> day was October 19, 2010 for Unit CGT5 and October 25, 2010 for Unit CGT6.

According to CPS Energy, the certification testing began on June 7, 2010, for Unit CGT5 and on June 3, 2010, for Unit CGT6. However, before the relative accuracy test audit (RATAs) of the NO<sub>x</sub> and O<sub>2</sub> CEMS could be completed, the units were forced off-line on July 16, 2010, due to damaged turbine blades caused by contamination of the demineralized water used for NO<sub>x</sub> reduction. On August 23, 2010, CPS Energy notified the Texas Commission on Environmental Quality (TCEQ) of the units' operational status and requested an extension of the deadline for completing CEMS certification and performance testing of Units CTG5 and CTG6, in view of the forced unit outages and uncertainty as to when the units would return to service. The TCEQ responded on September 14, 2010, granting an extension until December 1, 2010, to complete all required testing.

For Units CGT5 and CTG6, respectively, CEMS certification testing was completed on October 27, 2010 and November 4, 2010. Neither unit had accumulated 90 operating days as of day 180; Unit CGT5 had operated on only 52 days, and Unit CGT6 had operated on 50 days. Therefore, day 180 was the official Acid Rain Program certification deadline for both units, pursuant to §75.4(b).

Even though CPS Energy had requested from TCEQ and received an extended test deadline (to December 1, 2010) for Units CTG5 and CTG6, and was able to meet the deadline, that extension was in reference to requirements in 40 CFR 60.8(a) and 60.13(c) for new units to: (a) conduct performance testing within 60 days after achieving maximum production rate, but not later than 180 days after initial unit startup; and (b) conduct performance evaluations of required CEMS at the time of the performance tests or within 30 days thereafter. In view of this, CPS Energy submitted a petition to EPA on May 13, 2011 requesting extensions of the Acid Rain Program CEMS certification deadlines in §75.4(b) for Units CTG5 and CTG6. CPS energy requested that the deadline for each unit be extended to the date on which the RATA was completed, i.e., October 27, 2010 for Unit CTG5 and November 4, 2010 for Unit CTG6.

#### EPA's Determination

According to CPS Energy, issues with the turbine blades forced Units CGT5 and CGT6 to shutdown before completion of the initial NO<sub>x</sub> and O<sub>2</sub> CEMS certification testing. CPS Energy documented these issues in the May 13, 2011 petition. It appears that CPS Energy took reasonable and timely measures to resolve the problems. Therefore, EPA approves the CEMS

certification deadline extensions requested by CPS Energy for Units CTG5 and CTG6 (i.e., through October 27, 2010 for Unit CTG5 and through November 4, 2010 for Unit CTG6).

The approved CEMS certification deadline extensions are conditioned on CPS Energy reporting Part 75 emissions and heat input data for Units CTG5 and CTG6, starting with the first operating hour of each unit after its original certification deadline under §75.4(b), which, according to CPS Energy, are October 20, 2010, hour 06 for Unit CGT5 and October 26, 2010, hour 12 for Unit CGT6.

For each unit, CPS Energy must use the standard Part 75 missing data routines for NO<sub>x</sub> emission rate, found at §75.33(c), in the time period extending from the first operating hour after the original certification deadline until the successful completion of the CEMS certification tests, i.e., from October 20, 2010 hour 06 through October 27, 2010, hour 17 for Unit CGT5 and from October 26, 2010, hour 12 through November 4, 2010, hour 16 for Unit CGT6.

When CEMS certification tests required under §75.4(b) have not been completed by the applicable compliance date, §75.4(j) requires the owner or operator to report emissions data using either: maximum potential values; reference method data; or another procedure approved by petition under §75.66, until all certification tests are successfully completed. CPS Energy did not collect reference method data in the time periods in question, and the May 13, 2011 petition did not include a request for alternative missing data substitution. Therefore, CPS Energy must report the maximum potential NO<sub>x</sub> emission rate (calculated according to section 2.1.2.1 of Appendix A to Part 75) for each hour of the missing data periods described above.

EPA's determination relies on the accuracy and completeness of the information provided by CPS Energy in the May 13, 2011 petition and is appealable under Part 78. If you have any questions about this determination, please contact Travis Johnson at (202) 343-9018. Thank you for your continued cooperation.

Sincerely,

/s/

Sam Napolitano, Director  
Clean Air Markets Division

cc: John Smith, Texas CEQ  
Joyce Johnson, EPA Region VI  
Travis Johnson, CAMD