



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

OFFICE OF
AIR AND RADIATION

Michael E. Cartney
General Manager
Pittsfield Generating Company, L.P.
235 Merrill Road
Pittsfield, MA 01201

Dear Mr. Cartney:

This letter represents U.S. EPA's determination of applicability under §72.6(c) of the Acid Rain regulations in response to your letter of December 9, 2002, requesting that U.S. EPA make an applicability determination for Pittsfield Generating Company L.P.'s ("Pittsfield Gen") Pittsfield Generating Plant ("Pittsfield"), Facility ID 50002, in Pittsfield, Massachusetts.

Background

According to Pittsfield Gen, a total of 3 identical simple combustion turbines are installed at Pittsfield, Units A, B, and C. Each simple combustion turbine burns pipeline natural gas as its primary fuel and serves a single General Electric Frame 6 generator with a nameplate capacity of 40 MW. After producing electricity at the generators, the exhaust heat from Units A, B, and C is in turn used to generate steam at a heat recovery steam generator ("HRSG"), which does not have auxiliary firing and is headered to a single 60 MW steam turbine. Units A, B, and C each commenced commercial operation on August 29, 1990.

EPA's Determination

Each of the combustion turbines burn natural gas, therefore each is "fossil fuel-fired" and a "unit" as those terms are defined at §72.2. Since each of the units also produce electricity for sale, each unit is also a "utility unit" under §72.2 as well. The definition of "simple combustion turbine" under §72.2 states:

"Simple combustion turbine means a unit that is a rotary engine driven by a gas under pressure that is created by the combustion of any fuel. This term includes combined cycle units without auxiliary firing [emphasis added]."

Although Pittsfield is a combined cycle facility, Units A, B, and C are simple combustion turbines under §72.2 because the HRSG lacks auxiliary firing. Since Units A, B, and C are simple combustion turbines that commenced commercial operation before November 15, 1990, Units A, B, and C are unaffected units under §72.6(b)(1).

If auxiliary firing is added to the HRSG at Pittsfield, Units A, B, and C will become affected units. In that case, the owners and operators will have to ensure that each of the combustion turbines comply with all applicable requirements of the Acid Rain Program, including the requirement to apply for and receive an Acid Rain permit (under part 72), to monitor and report emissions (under part 75), and to hold allowances to cover sulfur dioxide emissions (under parts 72 and 73).

EPA's determination in this letter relies, and is contingent, on the accuracy and completeness of the representations in your letter, and is appealable under part 78. The applicable regulations require you to send copies of this letter to each owner or operator of the units. See §72.6(c)(1). If you have any further questions regarding the Acid Rain Program, please contact Robert Miller of EPA's Clean Air Markets Division at (202) 564-9077.

Sincerely,

/s/ (May 19, 2003)

Sam Napolitano, Acting Director
Clean Air Markets Division

cc: Karen Regas, Massachusetts DEP
Ian Cohen, U.S. EPA Region 1