

November 24, 2014

Mr. Michael Horrigan, General Manager
Designated Representative
Taunton Municipal Lighting Plant
PO Box 870
Taunton, MA 02780-0870

Re: Request for Exemption from the 7-Day Calibration Drift Test Requirement for a New Opacity Monitor on Unit 8 at the Cleary-Flood Station (Facility ID (ORISPL) 1682)

Dear Mr. Horrigan:

The United States Environmental Protection Agency (EPA) has reviewed the October 20, 2014 petition submitted under 40 CFR 75.66 by Taunton Municipal Lighting Plant (TMLP) requesting an exemption from the requirement to perform a 7-day calibration drift test for certification of a new continuous opacity monitoring system (COMS) on Unit 8 at the Cleary-Flood Station. EPA approves the petition, with conditions, as discussed below.

Background

TMLP operates the Cleary-Flood Station in Taunton, Massachusetts. Cleary-Flood Unit 8, which is wholly owned by TMLP, is a boiler that combusts residual and diesel oil and serves a generator with a capacity of 28 MW. Unit 8's reported annual capacity factors for 2011, 2012, and 2013 were 1.3%, 0.5%, and 3.9%, respectively. These capacity factors are sufficiently low to allow the unit to meet the definition of a "peaking unit" in 40 CFR 72.2.¹

According to TMLP, Unit 8 is subject to the Acid Rain Program and the CAIR NO_x Ozone Season Trading Program. TMLP is therefore required to continuously monitor and report sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon dioxide (CO₂) emissions and heat input for Unit 8 according to 40 CFR Part 75. Further, because Unit 8 combusts residual oil, §75.14(a) requires the owner or operator to install and operate a continuous opacity monitoring system (COMS). According to TMLP, the opacity monitor is required only for the Acid Rain Program; no other applicable state or federal regulations require TMLP to monitor opacity at Unit 8.

¹ In general, to qualify as a "peaking unit" under §72.2, a unit must have a capacity factor no greater than 10% on a three-year average basis and no greater than 20% in any single year.

At this time, the existing opacity monitor serving Cleary-Flood Unit 8 is being replaced.² Section 75.14(a) requires that the initial certification or recertification of a COMS for use under the Acid Rain Program be conducted according to Performance Specification 1 (PS-1) in Appendix B to 40 CFR Part 60. As noted by TMLP, one of the certification tests required under PS-1 is a 7-day calibration drift test. PS-1 calls for this test to be conducted over a 168-hour test period during which the combustion unit is operating at least 50% of the time.³ TMLP requests that the requirement to perform the 7-day calibration drift test be waived for Unit 8 in light of the fact that the unit is a peaking unit and operates very infrequently. According to TMLP, it could take “many months, if not years” to complete the test.

TMLP also points out that the impracticality of 7-day calibration tests for monitors installed on peaking units is recognized in the Part 75 rules with regard to gas concentration monitors and stack gas flow rate monitors. Specifically, Part 75 exempts gas concentration monitors and stack gas flow rate monitors that are installed on peaking units from the 7-day calibration error test requirements applicable to those types of monitors when installed on other units.⁴

EPA’s Determination

EPA approves TMLP’s October 20, 2014 petition to exempt the new COMS being installed on Cleary-Flood Unit 8 from the requirement to perform the 7-day calibration drift test, subject to the condition below. The reason for this approval is the unit’s infrequent utilization. The purpose of the 7-day calibration drift test is to demonstrate that the day-to-day calibration drift of the COMS is minimal over a relatively short period of unit operation. As previously noted, PS-1 requires the 7-day calibration drift test to be conducted over a 168-hour test period during which the combustion unit is operating at least 50% of the time. However, EPA recognizes that for a COMS installed on a peaking unit that operates sporadically, it could take weeks to complete a 7-day calibration drift test, causing the test to lose its significance.

This approval is consistent with the regulatory provision exempting gas concentration monitors and stack gas flow rate monitors installed on peaking units from the 7-day calibration error test requirements applicable to those types of monitors when installed on other units. The rationale for those exemptions is the same as the rationale for this petition approval. As we noted in the preamble to the rule establishing those exemptions, “[b]ecause peaking units operate infrequently, it is often difficult to complete a 7-day calibration error test within a reasonable time since the test must be done with the unit in operation. In cases where a 7-day calibration error test may take several weeks or months to complete, the test loses its meaning.”⁵

This approval is subject to the following condition: If at the end of a particular calendar year it is determined that Unit 8 no longer meets the definition of a “peaking unit” under 40 CFR 72.2, TMLP must perform a diagnostic 7-day calibration drift test of the COMS by no later than December 31 of the following calendar year.

² According to the petition, installation of the new opacity monitor was planned to take place the week of October 27, 2014.

³ See section 8.1(4) of Performance Specification 1, Appendix B to 40 CFR Part 60.

⁴ See sections 6.3.1 and 6.3.2, Appendix A to 40 CFR Part 75. The 7-day calibration error test required under 40 CFR Part 75 is similar in nature to the 7-day calibration drift test required under PS-1 of Appendix A to 40 CFR Part 60.

⁵ 67 Fed. Reg. 40394, 40408 (June 12, 2002).

EPA's Determination relies on the accuracy and completeness of the information provided by TMLP in the October 20, 2014, petition and is appealable under 40 CFR Part 78. If you have any questions about this determination, please contact Jenny Jachim at (202) 343-9590 or by email at jachim.jenny@epa.gov. Thank you for your continued cooperation.

Sincerely,

/s/
Reid P. Harvey, Director
Clean Air Markets Division

`cc: Susan Lancey, USEPA Region I
Todd Wheeler, Massachusetts DEP
Jenny Jachim, USEPA, CAMD