Ms. Jan Stavinoha
Manager, Environmental - Air Quality Group
Calpine Central, L.P.
700 Milam, Suite 800
Houston, Texas 77002

Re: Petition for extension for CEMS certification at Acadia Power Station (ORIS Code # 55173), Units CT 11 and CT 12

Dear Ms. Stavinoha:

The United States Environmental Protection Agency (EPA) has reviewed the June 24, 2002 petition from Calpine Central, L.P.’s (Calpine) for its Acadia Power Station (Acadia) 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\textsubscript{x}) for two of the four new combustion turbines (Units CT 11, CT 12, CT 24, and CT 25) at Acadia under Part 75. For the reasons discussed below, EPA approves the petition with conditions.

Background

Calpine is completing construction of Acadia, located in Eunice, Acadia Parish, Louisiana. In compliance with §75.4 (b)(2), certification of the CEMS for each combustion turbine generating unit must be completed within 90 days of commencement of commercial operation. Calpine submitted a monitoring plan to EPA for the four combustion turbines on April 9, 2002.

Based on the date on which units were synchronized to the grid and began producing electricity for sale, the CEMS certification deadlines for the units under §75.4 (b)(2) are: for Unit CT-11, June 28, 2002; for Unit CT 12, July 5, 2002; for Unit CT 24, July 25, 2002; and for Unit CT 25, August 18, 2002. Calpine requests an extension of the deadlines for Units CT-11 and CT-12 because of delays in equipment commissioning at Acadia. Specifically, there were technical problems involving the fiber optics for the connections between CEMS and computers, tubing from the gas calibration bottles, and construction and proper placement of the gas cylinders on the safety racks. No extension is requested for Units CT 24 and CT 25.

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EPA’s Determination

Calpine apparently experienced unavoidable, technical problems during the commissioning of the new units at Arcadia. These problems prevented Calpine from meeting the existing certification deadlines for Units CT 11, and CT 12. Calpine appears to have taken reasonable measures to resolve these problems. Under these circumstances, EPA approves the petition for extension of the certification deadlines for these units.

However, EPA maintains that the extensions should be conditioned on Calpine 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, Calpine shall report substitute data for Units CT 11 and CT 12, 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 NOx CEMS are certified under §75.20(a). In order to ensure that emissions are not under-reported, Calpine shall use, as substitute data, the maximum potential emission rate for NOx 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 June 24, 2002 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,

Peter E. Tarigows, Acting Director
Clean Air Markets Division

cc. Joseph Winkler, Region VI