



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 28 2002

OFFICE OF
AIR AND RADIATION

David J. Toombs
General Manager
Authorized Account Representative
Citizens Thermal Energy
366 Kentucky Avenue
Indianapolis, Indiana 46225-1165

Re: Petition for Alternative Monitoring Requirements at C.C. Perry K
Steam Plant, Units 15, 16, 17, and 18.

Dear Mr. Toombs:

EPA has reviewed your September 10, 2001 petition under 40 §75.66(a) to use alternative monitoring methodologies for measuring nitrogen oxide (NO_x) mass emissions Citizen Thermal Energy's (CTE) C.C. Perry K Steam Plant. As discussed below, EPA approves the petition in part for Units 15, 16, 17, and 18 and with conditions.

Background

C.C. Perry K Steam Plant includes six boilers (Units 11, 12, 13, 14, 15, and 16) that are subject to the NO_x Budget Trading Program under Part 96 and in the State of Indiana's NO_x State Implementation Plan and two boilers (Units 17 and 18) that are not subject to these requirements. None of the units, except Unit 11, are subject to the Acid Rain Program. Units 15, 16, 17, and 18 at the plant exhaust through Common Stack 1. No other units exhaust through Common Stack 1. Units 15 and 16 are stoker boilers combusting coal. Units 17 and 18, which are not subject to the NO_x Budget Trading Program, combust oil and have operated less than 50 hours per year in recent years. Under Part 75, CTE must monitor NO_x mass emissions and heat input for Units 15 and 16. Under §75.16(e), CTE may monitor NO_x mass emissions and heat input at the common stack and apportion the heat input to the individual units.

CTE intends to install a volumetric flow monitor and a NO_x continuous emissions monitoring system at Common Stack 1 to meet the monitoring requirements of Part 75 for Units

EPA's determinations in this letter rely on the accuracy and completeness of CTE's submission on September 10, 2001 and are appealable under Part 78. If you have any questions regarding this correspondence, please contact Louis Nichols at (202) 564-0161.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. McLean", written over a horizontal line.

Brian J. McLean, Director
Clean Air Markets Division

cc: Cecelia Mijares, Region 5
Dave Cline, IDEM