



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

SEP 25 2002

OFFICE OF
AIR AND RADIATION

Mr. Gerald Butcher
Senior Environmental Coordinator
WFEC
P.O. Box 429
Anadarko, Oklahoma, 73005-0429

Re: Petition for extension for CEMS certification deadline at WFEC's Mooreland Unit
3.

Dear Mr. Butcher:

The United States Environmental Protection Agency (EPA) has reviewed the July 31, 2002 petition from Western Farmers Electric Cooperative (WFEC) for its Mooreland Power Station (Mooreland), Facility ID (ORISPL) 3008, under §75.66(a) of the Acid Rain regulations. The petition requests, for Unit 3 at Mooreland, an extension of the deadline to complete certification of the unit's continuous emission monitoring system (CEMS) under Part 75. For the reasons discussed below, EPA approves the petition with conditions.

Background

WFEC operates Mooreland, located in Orland, Oklahoma. Unit 3 at Mooreland consists of a wall fired-dry bottom, gas fired boiler attached to a steam turbine generator. The unit monitors nitrogen oxides (NO_x), carbon dioxide (CO₂) as a diluent, and fuel flow. The unit's NO_x analyzer needed to have the range and span modified, which were changes requiring CEMS recertification. Under §75.4(b)(2), CEMS recertification must be completed within the earlier of 90 operating days or 180 calendar days after the changes in the CEMS. While the required certification tests were being completed, Unit 3's steam turbine generator developed technical problems, including vibration that damaged the rotating blades. Parts needed for repair must be manufactured on special order. These problems will prevent the normal operation of the unit. WFEC requests an extension of the deadline for CEMS certification.

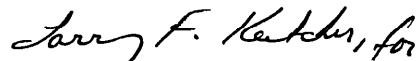
EPA's Determination

WFEC apparently experienced unavoidable, technical problems during the CEMS certification testing for Unit 3 at Mooreland. These problems prevented WFEC from meeting the existing certification deadline under §75.4(b)(2). WFEC appears to be taking reasonable measures to resolve these problems. Under these circumstances, EPA approves the petition for extension of the completion of required tests until 30 operating days after the unit recommences commercial operation.

However, EPA maintains that the extension should be conditioned on WFEC reporting emissions for the period since the event that triggered the recertification process. Consequently, WFEC shall report substitute data for Unit 3, for each operating hour, from the first hour from the time of the event that triggered the recertification after the unit's commencement of commercial operation until the hour for which that unit's NO_x CEMS are certified under §75.20(a). In order to ensure that emissions are not under-reported, WFEC shall use, as substitute data, the maximum potential emission rate for NO_x 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 July 31, 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. Tsirigotis, Acting Director
Clean Air Markets Division

cc. Joseph Winkler, Region VI