

MAR 21 2002

Mr. Steve Howell
Manager of Engineering Services
Designated Representative
Oklahoma Municipal Power Authority
P.O. Box 1960
2300 East Second St.
Edmond, Oklahoma 73083-1960

Re: Petition for extension of certification deadline for OMPA's Ponca City Municipal Steam Plant

Dear Mr. Howell:

The United States Environmental Protection Agency (EPA) has reviewed Oklahoma Municipal Power Authority's (OMPA) petition to extend the deadline for performing the relative accuracy tests audit (RATA) for Part 75 continuous emission monitoring systems (CEMS). As discussed below, EPA approves the petition in part and with conditions.

Background

OMPA's Ponca City Municipal Steam Plant (ORIS 762) includes one General Electric LM6000 aeroderivative combustion turbine with heat recovery steam generator, referred as Unit EU #1 and #2. Section 75.4 (b)(2) requires the completion of a RATA and certification of the unit's CEMS within 90 days of the commencement of commercial operation. The combustion turbine is currently inoperable due to engine failure. An inner shaft oil-air seal fractured causing a major balancing problem in the unit, creating the failure.

OMPA is working to make the combustion turbine operational. The completion of the work is expected by mid-2002. OMPA requests an extension of the deadline for performance of the RATA and certification of the CEMS until the 3rd quarter of 2002 to allow extra time for shakedown of the unit after restarting the engine.

OMPA also indicated that the units will operate primarily during summertime. Extending the deadline to the 3rd quarter, 2002, will remove the need to make a special run during the 1st quarter to complete the RATA.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

EPA's Determination

As discussed above, OMPA experienced and has outstanding, unavoidable technical problems related to the unit's operations. These difficulties continue to affect the company's ability to comply with current RATA requirements. Further, the company appears to have taken reasonable measures to resolve the problems. Consequently, EPA approves the requested extension of the CEMS certification deadline until the earlier of September 30, 2002 or 90 operating days after the unit commenced commercial operation.

The purposes of Part 75 include ensuring that each CEMS is operated and quality assured in a timely manner to provide consistent, accurate emission data throughout the operations of the affected unit. EPA approves the petition for an extension of the CEMs certification deadline, but conditions the extension on OMPA reporting substitute data in accordance with Section 2.1.2.1 of Appendix A of Part 75 or any hours of unit operation, starting from the original certification deadline and continuing until the provisional certification of the CEMS is completed.

With regards to OMPA's request that all future RATAs be required to be performed only in the 3rd quarter of the year, EPA denies the request as premature. Neither OMPA nor EPA can predict all the circumstances that may require performance of RATAs in the future. It may or may not be appropriate to delay all such RATAs until the 3rd quarter.

EPA's determination relies on the accuracy and completeness of the information in the January 25, 2002 petition and is appealable under part 78 of the Acid Rain regulations. If you have any further questions or concerns about this matter, please contact Ruben Deza at (202) 564-3956 or deza.ruben@epa.gov.

Sincerely,

Brian J. McLean, Director
Clean Air Markets Division

cc: Joseph Winkler, Region VI
John R. Smith, State of Texas