

September 11, 2001

George Keefe  
Plant Manager  
Mirant Zeeland, LLC  
425 Fairview Road  
Zeeland, Michigan 49464

Subject: Petition for an Extension of CEMS Certification Deadline for  
Zeeland Generating Plant

Dear Mr. Keefe:

EPA has reviewed Mirant Zeeland, LLC's (Mirant) July 11, 2001 petition under § 75.66(a) requesting a 60-day extension of the continuous emission monitoring system (CEMS) certification deadline for the two units at the Zeeland Generating Plant. As discussed below, EPA approves an extension for these units with certain conditions.

#### Background

The units at Zeeland Generating Plant are two, simple-cycle, combustion turbines located in Michigan. Unit CC1 commenced commercial operation April 11, 2001 and Unit CC2 commenced commercial operation April 30, 2001. Under §75.4(b), each unit's nitrogen oxides (NO<sub>x</sub>) CEMS must be certified within 90 days after commencement of commercial operation of the unit. Mirant requested a 60-day extension of the deadline for certifying the NO<sub>x</sub> CEMS on the two units. Mirant stated that the certification testing had been delayed because neither of the units had experienced 7 operating days following completion of the relative accuracy test audit (RATA). The units needed additional operating hours in order to complete certification, e.g., to perform the 7-day calibration error tests. Both units completed certification testing on September 5, 2001.

#### EPA's Determination

Because of the lack of operating hours for the units at Zeeland Generating Plant, EPA is extending the deadline for each unit to September 5, 2001. However, EPA maintains that the extension should be conditioned on Mirant reporting NO<sub>x</sub> emissions for the entire period for which reporting is required under part 75, i.e., starting from the original certification deadline.

Consequently, Mirant shall report substitute data for both units 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 NO<sub>x</sub> CEMS is certified under § 75.20(a). In order to ensure that NO<sub>x</sub> emissions are not under-reported, Mirant shall use, as substitute data, the maximum potential emission rate for NO<sub>x</sub> in accordance with part 75, Appendix A, Section 2.1.2.1.

EPA's determination in this letter relies on the accuracy and completeness of Mirant's submission July 11, 2001 and is appealable under part 78. If you have any questions regarding this correspondence, please contact Louis Nichols at (202) 564-0161.

Sincerely,

/s/

Brian J. McLean, Director  
Clean Air Markets Division

cc: Constantine Blathras, Region 5  
Karen Kajiyi-Mills, MDEQ