



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

May 9, 2001

OFFICE OF
AIR AND RADIATION

James M. Andrew
Designated Representative
Arizona Electric Power Cooperative, Inc.
3525 N. US Highway 191 S.
Cochise, AZ 85606

Re: Petition to use reported emission data at AEPCO's Apache Units 2 and 3

Dear Mr. Andrew:

EPA has reviewed your November 17, 2000 petition under 40 CFR 75.66(a) for the Arizona Electric Power Cooperative, Inc.'s (AEPCO) Apache, Units 2 and 3, ORIS Code 160. The petition states that AEPCO mistakenly used expired protocol calibration gases in tests at the units, but that this resulted in over-reporting the units' emissions. The petition requests approval to use the units' reported sulfur dioxide (SO₂) and nitrogen oxide (NO_x) data or, alternatively, to allow the substitution of a default value other than the maximum potential value. As explained below, EPA approves the petition.

Background

In August 2000, AEPCO discovered that the certifications of three low- and mid-range triple-blend protocol calibration gases had expired. The gases had been used for the quarterly linearity tests at Units 2 and 3 between the fourth quarter of 1999 and September, 2000. Re-analysis of these calibration gases showed that the concentrations of SO₂ and NO_x for two of the gases were lower than the tagged certification values. The third calibration gas still had the proper SO₂ and NO_x concentrations. After AEPCO revised the results of the linearity tests by substituting the new concentration values for two of the gases, the units failed the mid-range portion of the linearity tests for SO₂ and NO_x for the fourth quarter of 1999. AEPCO also found that, for the first and second quarter, and part of the third quarter, 2000, the units failed the low- and mid-range portions of the linearity tests for SO₂. According to AEPCO, the certifications of the high-range calibration gases were still valid, and the high-range linearity test results for these same periods were not affected.

AEPCO states that use of the expired calibration gases resulted in overstated SO₂ and NO_x emissions since the SO₂ and NO_x concentrations in two of the gases were lower than the tag values. AEPCO requests that EPA approve use of the units' reported SO₂ and NO_x emissions or, alternatively, substitution of a default value other than the maximum potential values for the emissions.

EPA's Determination

EPA agrees that AEPCO should not be required to resubmit SO₂ and NO_x emission data for Units 2 and 3 for the four quarter of 1999 through the third quarter of 2000. By monitoring emissions with monitors quality-assured using calibration gases having actual concentration values lower than the gases' tagged certification values, AEPCO did not understate the units' emissions. If anything, the monitors quality-assured in this way may have been overly sensitive and overstated emissions during this period. Consequently, EPA concludes that the emission data should be treated as valid, and EPA approves the petition.

EPA's determination relies on the accuracy and completeness of the November 17, 2000 petition and supplemental information dated January 23, 2001 and is appealable under 40 CFR part 78. If you have any questions about these matters, please contact Theresa Alexander of my staff, at (202) 564-9747 or alexander.theresa@epa.gov. Thank you for your continued cooperation.

Sincerely,

/s/

Brian J. McLean, Director
Clean Air Markets Division

cc: Steven Frey, EPA Region 9
David Gahr, Nevada DCNR
Theresa Alexander, Clean Air Markets Division
Matthew Boze, Clean Air Markets Division